



U.S. General Services Administration

February 25, 2021

Lance Nixon
Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
nixon.lance@epa.gov

RE: Request for Information Pursuant to Section 104 of CERCLA for Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Mr. Nixon:

This letter is in response to your email dated February 1, 2021 requesting information and documents relating to the Fansteel Metals Facility ("Fansteel") pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e). As per our discussion February 12, 2021 with you and Elizabeth Pletan, Attorney, Superfund Branch Office of Regional Counsel, we believe that the documents you seek are in the custody of the Department of Defense, Defense Logistics Agency ("DLA") and/or the National Archives Records Administration (NARA).

Following our February 12, 2021 conversation you provided to us (1) Shipping documents between Fansteel and GSA ("Shipping Documents"); and (2) Amendment No. 1 to Contract No. GS-00P-23252 (SCM) dated March 22, 1967 ("Amendment"). We shared these documents with Robert Smudde, GSA's records custodian, who searched copies of records that he has retained related to GSA's history. The official records versions are with NARA or DLA. Mr. Smudde found a press release dated December 15, 1965 announcing the award to Fansteel Metallurgical Corporation, North Chicago, Illinois for the conversion of Government-furnished tantalum/columbium bearing material. ("Press Release" attached here as Exhibit "A") and a 1963 list of GSA/DMS depots ("Depot List" attached here as Exhibit "B").

The Shipping Document refers to shipments made from Fansteel to GSA at the PMDS Gadsden Depot (see pp. 1, 5-8, 10-11) and the PMDS Binghamton Depot (see pp. 23 and 24). Those two locations appear on the Depot List as locations used by GSA as part of the National Defense Stockpile ("Stockpile"). On July 1, 1988, the director of the Office of Management and Budget (OMB) issued a document titled "Determinations with Respect to Transfer of Functions

Pursuant to Public Law 100-180 and Executive Order 12626" directing the funds, inventory, personal property, personnel, and records of GSA associated with the National Defense Stockpile be transferred to the DLA. ("Determination" attached here as Exhibit "C")

Pursuant to that Determination we believe that all records associated with GSA's relationship with Fansteel have been transferred to the DLA. Attached as Exhibit "D" is a document showing the records transferred although there is no specific mention of Fansteel.

Please let me know if you have any questions or if we can be of further assistance.

Sincerely,

Tina Chiappetta
Assistant General Counsel
Real Property Division
General Services Administration
1800 F Street NW, Room 2031
Washington, DC 20405
(202) 258-8626

Enclosures (4)

cc: Kate Healy, Senior Assistant General Counsel, Real Property Division, GSA

GSA

NEWS RELEASE

OFFICE OF INFORMATION
GENERAL SERVICES ADMINISTRATION
ROOM 5113, 18TH AND F STREETS NW.
WASHINGTON, D.C. 20405

343-4511

FOR IMMEDIATE RELEASE
WEDNESDAY, DECEMBER 15, 1965

GSA # 3060

The General Services Administration announced today the award of a contract for conversion of Government-furnished tantalum/columbium bearing material to 84,500 pounds of tantalum metal powder of four different grades; 15,500 pounds of tantalum metal slabs; 15,000 pounds of columbium metal powder and approximately 90,000 pounds of columbium oxide powder. The successful bidder was Fansteel Metallurgical Corporation, North Chicago, Illinois. Payment for these services will be made with Government-owned materials.

These conversion services were advertised by GSA in Bid Invitation No. DMS-ORES-44. Three bids were publicly opened on November 30, 1965.

FOR IMMEDIATE RELEASE WEDNESDAY DECEMBER 15, 1965

FOR INFORMATION SERVICE RECEIVED 12 DECEMBER 14 1962

IN 1952-1953, the first year of the Korean War, the United States and its allies suffered a severe economic recession.

The recession was caused by a combination of factors, including a decline in government spending and a rise in interest rates.

The recession was also caused by a decline in private investment and a rise in taxes.

The recession was a major factor in the decision to end the Korean War.

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RECEIVED 12 DECEMBER 14 1962

FOR INFORMATION SERVICE RECEIVED

12 DECEMBER 14 1962

COV

GSA OPERATED DEPOTS

GSA/DMS DEPOTS

New Bedford, Massachusetts
Belle Meade, New Jersey
Bethlehem, Pennsylvania
Binghamton, New York
Buffalo, New York
Iona Island, New York
Scotia, New York
Somerville, New Jersey
Curtis Bay, Maryland
Point Pleasant, West Virginia
Gadsden, Alabama
Jeffersonville, Indiana
Dayton, Ohio
Hammond, Indiana
New Haven, Indiana
Sharonville, Ohio
Wardwell, Ohio
Marion, Ohio
Topeka, Kansas
Baton Rouge, Louisiana
New Orleans (Harahan), Louisiana

GSA/DMS MACHINE TOOL PRESERVATION DEPOTS

Burlington, New Jersey
Marietta, Georgia
Dixon, Illinois

GSA/CDM DEPOTS

Gilbertville, Massachusetts
Horseheads, New York
Lebanon, Pennsylvania
Montoursville, Pennsylvania
Romulus, New York
Shamokin, Pennsylvania
Williamsburg, Virginia

Figure 4-1. GSA Operated Depots
(Part 1 of 2)

DETERMINATIONS WITH RESPECT TO TRANSFER OF FUNCTIONS
PURSUANT TO PUBLIC LAW 100-180 AND EXECUTIVE ORDER 12626

This determination is made pursuant to Section 3203 of the National Defense Authorization Act for FY 1988 (P.L. 100-180), and Executive Order 12626 (February 25, 1988), and 31 U.S.C. Section 1531 and Executive Order 11541. Effective on July 3, 1988, there shall be transferred from the General Services Administration (GSA) and the Federal Emergency Management Agency (FEMA) to the Department of Defense, the personnel, funds, inventory of the National Defense Stockpile, personal property, and records of GSA, Office of ~~the National Defense Stockpile, and FEMA, Office of~~ Mobilization Preparedness, as set forth below, that I hereby determine relate primarily to the functions transferred:

A. Appropriations and Funds

The balance of funds for the operation and management of the National Defense Stockpile for which expenses remain outstanding, as provided in Attachment A, are hereby transferred. Appropriations relating to the FEMA functions transferred are provided for in FEMA's FY 1988 appropriations. Funds required for the FY 1988 operation of the National Defense Stockpile are appropriated through the National Defense Stockpile Transaction Fund.

B. Personnel and Positions

The personnel and positions identified in Attachment B, which total 298 FTE from GSA and 2 FTE from FEMA, are hereby transferred.

C. Property

No real property will be transferred by this order since the Federal Property Resources Service does not own any land. The existing agreements on rental payments for the use of land and facilities used to store stockpile materials will not change, except that DLA will provide such payments from its operating budget for the stockpile included in the 1989 level for Operation and Maintenance, Defense Agencies.

All personal property associated with the National Defense Stockpile function is hereby transferred to the Department of Defense. Included in this transfer are all contracts and any liabilities, rights or interests arising therefrom or related thereto that pertain to the transfer of the National Defense Stockpile from GSA and FEMA to the Department of Defense as evidenced by the transferred records provided for by this Order. This includes personal property owned by GSA and FEMA relating to the functions transferred or U.S. Government-owned property held or used by any contractor under any contract referenced by the preceding sentence.

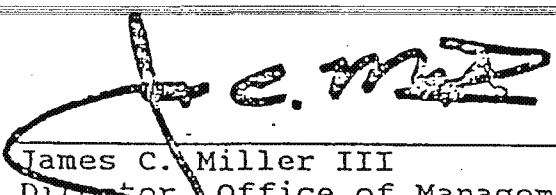
D. Records

The records as identified in attachment D.

Approved:

JUL 1 1988

Date


James C. Miller III
Director, Office of Management
and Budget

DETERMINATION WITH RESPECT TO TRANSFER
OF FUNCTION PURSUANT TO EXECUTIVE ORDER 12626

Pursuant to Public Law 100-180, Executive Order 12626 and effective on July 3, 1988, there shall be transferred from GSA and FEMA to DOD the funds set forth below, that I hereby determine relate primarily to the functions transferred.

Appropriations and Funds

<u>From</u>	<u>Amount</u>	<u>To</u>
GSA	The estimated amount	Operation and
Operating Expenses	of the accounts of	Maintenance,
Federal Property	June 15, 1988	Defense Agencies
Resources Service		

47X0533	\$13,784,906.65	97X0100
477/80533	4,781,289.43	977/80100
476/70533	558,487.56	976/70100
475/60533	1,373,561.69	975/60100
47M0533	1,387,143.30	97M0100

National Defense
Stockpile
Transaction Fund

47X5245

Unexpended
Balance

National Defense
Stockpile
Transaction Fund

97X4550

National Defense
Stockpile
Transaction Fund

47X4550

Unexpended
Balance

National Defense
Stockpile
Transaction Fund

97X4550

FEMA

Emergency Management,
Planning & Assistance
5880101

\$ 82,000

9780100

Salaries, and Expenses
5880100

\$ 31,000

9780100

NATIONAL DEFENSE STOCKPILE

PERSONNEL

ATTACHMENT B

EMPLOYEE NAME	SERIES/GRADE/STEP	SALARY	POSITION TITLE	
APRYTA	PRICILLA	GS-0310-03/02	112,429	CLERK-TYPIST
AUDCOCK	LARA	GS-0322-04/01	115,016	CLERK-TYPIST
AELLEN	JOHN	GS-2030-12/04	136,539	SUPV. STORAGE SPEC. (CHIEF)
AMOLE	JOHN	WG-4749-10/05	125,691	MAINTENANCE MECHANIC
ARNOS	DALE	WG-5803-10/02	124,794	HEAVY MOBILE EOP MECH
ARYANITES	CONSTANT	WG-6907-06/05	118,741	WAREHOUSE WORKER
ATTALLAH	ALFRED	GS-2030-11/05	131,412	STORAGE SPECIALIST
BABCY	JOHN	GM-1101-15/00	168,992	DIVISION DIRECTOR, DNP
BARCALON	ROBERT	GS-1910-11/04	130,488	QUALITY ASSURANCE SPEC
BARON	PATRICIA	GS-1910-09/03	124,435	QUALITY ASSURANCE SPEC
BARTELL	CURTIS	WG-3502-03/01	117,056	LABORER
BASEN	DONALD	WG-4607-09/05	125,900	CARPENTER
BENSON	BETTY	GS-0341-05/06	126,727	ADMINISTRATIVE OFFICER
BERGAU	JEANETTE	GS-0318-04/01	115,900	SECRETARY (TYPING)
RIXLER	ALLEN	GS-1910-12/02	134,325	SUPV QUAL ASSUR SP/CHIEF
BLACK	LESTER	WG-4749-09/01	122,644	MAINTENANCE MECHANIC
BLACKSTONE	ANN	GS-1102-12/03	135,432	CONTRACT SPECIALIST
BOWERS	TIMOTHY	WG-6907-05/02	118,992	WAREHOUSE WORKER
ROWMAN	STEVEN	GS-0334-11/02	128,640	COMPUTER PROGRAM ANALYST
BOYNTON	JASON	WG-6907-05/02	119,952	WAREHOUSE WORKER
BRETZ	ROBERT	GM-2030-14/00	149,791	ZONE MANAGER
BROCKMAN	ROBERT	GS-1910-11/06	132,336	QUALITY ASSURANCE SPEC
BRODERICK	ROBERT	WS-3566-01/05	121,413	CUSTODIAL FOREMAN
BROOKS	FREDERIC	GS-6907-11/03	129,564	SUPV. STORAGE SPEC. (CHIEF)
BROOKS	FREDERICK	WG-6907-06/05	122,832	WAREHOUSE WORKER (FLO)
BROOKS	JOHN	WG-6907-04/05	120,870	WAREHOUSE WORKER
BROOKS	MARK	WG-6907-05/02	119,764	WAREHOUSE WORKER
BROUILLETTE	DONALD	GS-1910-11/05	131,412	QUALITY ASSURANCE SPEC
BROWN	DARRIN	WG-3502-03/01	117,056	LABORER
BUFFORD	DOUGLAS	WG-5705-06/03	118,970	TRACTOR OPERATOR
BUTLER	SUZANNE	GS-0322-04/01	115,016	CLERK-TYPIST
CANGRO	VINCENT	GM-2030-13/00	146,042	SUPV. STORAGE SPEC. (CHIEF)
CANTY	VIRGINIA	GS-0301-05/10	121,244	SECRETARY (TYPING)
CARNES	WENDY	GS-0322-05/03	116,126	QUALITY ASSURANCE SPEC
CARRIZALES	GILBERT	WG-6907-04/01	118,240	WAREHOUSE WORKER (FLO)
CASHMAN	BERT	WG-4206-09/05	122,247	PLUMBER
CHAFIN	SARAH	GS-1101-11/07	133,260	STRATEGIC MATLS. REPR. SPEC.
CHILD	CAROLYN	GS-0318-05/10	119,654	SECRETARY (TYPING)
CINTRON	KAREN	WG-5701-07/04	125,169	MOBILE EQUIP. OPER
CLARKE	DOROTHY	GS-2030-09/06	126,727	STORAGE SPECIALIST
CLEMO	HOWARD	WG-6907-05/01	119,138	WAREHOUSE WORKER
CONSIGLIO	JEROME	GM-1101-15/00	165,235	DIRECTOR, CONTRACTS DIVISION
CORDEIRO	SUSAN	GS-0322-04/01	113,513	CLERK-TYPIST
CORMIER	PAUL	WG-6907-06/05	118,741	WAREHOUSE WORKER (FLO)
COTTON	SHARON	GS-0322-05/04	116,630	CLERK-TYPIST
CRAFT	HARRY	GM-1640-14/00	154,398	FACIL. MGMT. CFCR./CHIEF
CRAIG	LORRIE	GS-0322-03/01	112,036	CLERK-TYPIST
CROWLEY	JOSEPH	GM-1102-13/00	145,430	CONTRACT SPECIALIST
CUCCHIARD	JOSEPH	GS-2030-12/06	138,753	STORAGE MANAGER
DATOLLI	JOHN	GS-0801-13/01	139,501	GENERAL ENGINEER
DAVIDSON	MARY	GS-1910-07/01	118,726	QUALITY ASSURANCE SPEC
DAVIS	KAREN	GS-1101-13/03	142,135	STRATEGIC HTLS MGMT. SPEC.

DAY	FRANK	WG-4206-09/03	123,813	PLUMBER
DEGRAZIA	THOMAS	GM-2003-14/00	160,663	ZONE MANAGER
DEISTER	CHERYL	GS-1101-13/04	143,452	STRATEGIC MTLs MGMT. SPEC.
DELMOSTE	CHARLES	GS-1910-11/01	127,716	QUALITY ASSURANCE SPEC
DILLON	LEONARD	GS-1910-07/10	125,229	QUALITY ASSURANCE SPEC
DIPALO	ERIC	GS-1910-09/05	125,963	QUALITY ASSURANCE SPEC
DULANEY	SPENSER	GS-1910-12/06	138,753	QUALITY ASSURANCE SPEC
DUNCAN	RAYMOND	GM-1910-14/00	156,268	SUPV QUAL ASSUR SP/CHIEF
DWYER	THOMAS	WG-6907-06/05	122,832	WAREHOUSE WORKER (FLO)
EDMONSON	WILBUR	GS-1910-11/03	129,564	QUALITY ASSURANCE SPEC
EILENBERGER	EDWARD	WG-4102-09/05	122,247	PAINTER
EMERICK	CHESTER	GS-1910-09/09	129,019	QUALITY ASSURANCE SPEC
ERICKSON	ROBERT	GS-2030-12/05	137,646	SUPV. STORAGE SPEC. (CHIEF)
ESTILL	CHARLES	GS-1910-11/04	130,488	QUALITY ASSURANCE SPEC
FAIRHURST	JAMES	WG-6907-04/01	114,664	WAREHOUSE WORKER (FLO)
FALGIER	FRANK	WG-4749-05/04	121,830	MAINTENANCE WORKER
FARLEY	JAMES	GS-2030-07/01	118,726	STORAGE SPECIALIST
FAULCONER	JOHN	GM-1101-14/00	159,424	STRATEGIC MTLs MGMT. SPEC.
FAYORS	RONNIE	GS-2030-05/01	115,118	STORAGE SPECIALIST
FAXON	CHARLES	GS-1910-13/08	148,720	QUALITY ASSURANCE SPEC
FELDMAN	JILL	GS-0318-04/01	113,513	SECRETARY (TYPING)
FERKEE	STEVEN	WG-4749-09/03	124,042	MAINTENANCE MECHANIC
FISH	DONALD	GS-2030-12/04	136,539	SUPV. STORAGE SPEC. (CHIEF)
FORD	JESSE	GS-2030-12/04	136,539	STORAGE SPECIALIST
FORD	JOSEPH	WS-6907-04/05	130,115	WAREHOUSE WORKER FOREMAN
FOWLER	WILLIAM	GS-1101-13/08	148,720	SPECIAL ASSISTANT
FOXWORTH	WILLIE	GS-1910-09/01	122,907	PROGRAM ANALYST
FRECHERICKS	AQUILLA	WG-5803-10/01	122,402	HEAVY MOBILE EOP MECH
FRENCH	MICHELLE	GS-0322-05/01	115,118	CLERK-TYPIST
FRITZ	WILLIAM	GS-2030-11/04	130,488	STORAGE SPECIALIST
FRYE	KERMIT	GM-1910-14/00	160,532	SUPV. STCR. SPEC. (DIR)
GALLUCCI	RUDOLPH	WG-4749-09/05	126,237	MAINTENANCE MECHANIC
GARY	ALICIA	GS-0318-06/02	116,174	SECRETARY (TYPING)
GAUNT	DENZIL	WS-4737-09/03	130,867	GENERAL ECP. MECH FOREMAN
GLASS	FRANCES	GS-0318-07/08	123,094	SECRETARY (STENO)
GREEN	EDWARD	GS-2030-11/04	130,488	STORAGE SPECIALIST
GRIKES	ROBERT	WG-6907-05/02	120,348	WAREHOUSE WORKER
GUITION	WILLIAM	GS-2030-12/01	133,218	SUPV. STORAGE SPEC. (CHIEF)
GURLEY	SAMUEL	GS-2030-13/03	142,135	STORAGE SPECIALIST
GYDESEN	THOMAS	WG-5716-10/04	124,794	ENGINEERING EQUIP. OPER.
HALLAS	STEPHEN	WG-4749-05/01	122,289	MAINTENANCE WORKER
HAMILTON	CAROLYN	GS-0318-07/06	121,846	SECRETARY (STENO)
HARBIN	JEROME	GS-0301-13/08	148,720	INFORMATION SYS. SPEC.
HARMON	HELEN	GS-2005-05/07	118,142	SUPPLY CLERK
HARRINGTON	ROXANNE	GS-0322-03/01	112,038	CLERK-TYPIST
HARRISON	PATRICIA	GS-1101-12/04	136,539	STRATEGIC MTLs MGMT. SPEC.
HEARD	NINA	GS-0345-13/07	147,403	PROGRAM ANALYST
HENSON	ROGER	WG-2805-10/05	126,195	ELECTRICIAN
HIBBERT	SAMUEL	WG-6907-06/05	118,741	WAREHOUSE WORKER (FLO)
HILL	EDWARD	WG-6907-06/03	121,726	WAREHOUSE WORKER (FLO)
HINEMAN	CLIFFORD	GS-1910-11/03	129,564	QUALITY ASSURANCE SPEC
HOBACK	DARLENE	GS-0110-13/04	143,452	ECONOMIST
HOCHBERG	MARTHA	GS-1104-12/07	139,860	PROPERTY DISPOSAL SPEC.

NATIONAL DEFENSE STOCKPILE OPERATIONS

PAGE 3

HOCKADAY	ELEANOR	GS-0303-09/06	\$26,727	STAFF ASSISTANT
HOFFMAN	FRANK	WG-6907-05/05	\$23,959	WAREHOUSE WORKER
HOLDER	CORNEL	GS-1102-12/03	\$35,432	CONTRACT SPECIALIST
HOOVER	CARL	WS-6907-06/03	\$29,385	WAREHOUSE WORKER FOREMAN
HORNER	JAY	GS-1910-07/05	\$21,222	QUALITY ASSURANCE SPEC
HUNT	SHERKY	GS-0322-04/01	\$13,513	CLERK-TYPIST
HYZEN	JOHN	WG-2805-10/03	\$21,307	ELECTRICIAN
INGE	JOSEPH	GS-1910-11/04	\$30,408	QUALITY ASSURANCE SPEC
JACKSON	DOROTHY	GS-2005-04/10	\$17,563	SUPPLY CLERK
JACKSON	MARY	GS-2030-11/04	\$30,488	STORAGE SPECIALIST
JAMES	MINERVA	GS-0318-06/05	\$19,827	SECRETARY (STENO)
JANORSKI	PHYLLIS	GS-0318-06/02	\$17,413	SECRETARY (STENO)
JENKINS	ANTHONY	GS-1910-09/06	\$26,727	QUALITY ASSURANCE SPEC
JOHNSON	JAMES	GS-1910-11/02	\$26,640	QUALITY ASSURANCE SPEC
JOHNSON	ANTHONY	WG-4749-07/01	\$20,052	MAINTENANCE WORKER
JONES	LINDA	GS-0334-05/09	\$18,725	COMPUTER PROGRAM ANALYST
JONES	BEVERLY	GS-0000-04/01	\$13,513	CLERK-TYPIST
JONES	CLIFFORD	GS-2030-07/03	\$19,974	STORAGE SPECIALIST
KAHLER	ERNEST	GS-2030-12/05	\$37,646	SUPV. STORAGE SPECIALIST
KAPP	JAMES	GS-2030-12/04	\$36,539	STORAGE SPECIALIST
KARGGI	JULIA	GS-0318-05/10	\$19,654	SECRETARY (TYPING)
KATES	STEVEN	GS-2303-07/08	\$23,094	STORAGE SPECIALIST
KENAR	CHERYL	GS-1101-07/07	\$22,470	MARKET ASSISTANT
KENNEY	DAVID	GS-2030-09/07	\$27,491	STORAGE SPECIALIST
KIRKMAN	LEONARD	WG-6907-05/03	\$16,640	WAREHOUSE WORKER
KOLENOA	ERADLEY	WG-4749-05/03	\$22,289	MAINTENANCE WORKER
KUSTICK	KENNETH	WG-6907-06/05	\$20,014	WAREHOUSE WORKER (FLO)
KOVACH	RONALD	WG-6907-06/01	\$23,061	WAREHOUSE WORKER (FLO)
KULIG	STEPHEN	GS-1640-11/01	\$27,716	FACIL. MGMT SPEC.
L'HEUREUX	JOHN W.	ES-0340-04/00	\$71,910	ASSISTANT COMMISSIONER
LARSEN	SCOTT	WG-6907-05/01	\$15,402	WAREHOUSE WORKER
LAW	WILLIAM	GS-1102-12/07	\$39,660	CONTRACT SPECIALIST
LAWRENSEN	CATHERINE	GM-1910-15/00	\$68,543	SUPV QUAL ASSUR SPEC (DIR)
LEE	BETTY	GS-0318-04/01	\$13,513	SECRETARY (TYPING)
LEPAGE	MELVIN	GS-1910-12/04	\$36,539	SUPV. QUAL. ASSUR. SPEC.
LETTIERI	GILES	GM-1910-14/00	\$51,867	SUPV QUAL ASSUR SP/CHIEF
LISEMBEE	BERNARD	WG-6907-06/03	\$21,726	WAREHOUSE WORKER (FLO)
LONG	WILSON, JR	WG-3566-02/05	\$19,221	CUSTODIAL/LABORER
LONG	ERMA	GS-1101-12/07	\$39,860	STRATEGIC MTLs MGMT. SPEC.
LONG	MILTON	WG-5701-09/03	\$23,520	MOBILE EQUIP. OPER
LOTHAMER	READUS	GM-1101-15/00	\$69,473	STRATEGIC MTLs. MG. OFFICER
LOVELACE	DORIS	GS-0322-04/01	\$13,513	CLERK-TYPIST
LUTZ	LYLE	GM-2030-14/00	\$54,916	ZONE MANAGER
LYNCH	ROBERT	GS-1150-13/05	\$44,769	INDUSTRIAL SPEC.
MAMER	DENNIS	GM-1640-13/00	\$40,818	SUPV. STORAGE SPEC. (CHIEF)
MANN	DMER	GS-2030-12/06	\$38,753	STORAGE SPECIALIST
MARTINDALE	WALLACE	GS-1910-11/09	\$35,108	QUALITY ASSURANCE SPEC
MARTIND	CRAIG	WG-6907-05/02	\$17,235	WAREHOUSE WORKER (FLO)
MASTRONARDI	RICHARD	WG-6907-05/01	\$19,138	WAREHOUSE WORKER
MATTHEWS	MICHAEL	WG-3502-04/02	\$16,592	LABORER
MATTHEWS	JAMES	WG-2805-10/04	\$24,794	ELECTRICIAN
MATTHEWS	MURPHY	GS-1101-07/09	\$23,718	STRATEGIC MTLs MGMT. SPEC.
MATTHEWS	STANLEY	GS-1101-12/04	\$36,539	STRATEGIC MTLs. REPCR. SPEC.

MCCORMISH	THOMAS	GS-1910-11/04	\$30,488	QUALITY ASSURANCE SPEC
MCDANIEL	CLARENCE	GS-1910-11/08	\$34,184	QUALITY ASSURANCE SPEC
MCDANIELS	FRANCES	GS-0318-05/05	\$17,124	SECRETARY (TYPING)
MCDUFF	JOHNNY	GM-2030-13/00	\$44,112	SUPV. STORAGE SPECIALIST
MCGILL	PHYLLIS	GS-2030-12/04	\$36,539	STORAGE SPECIALIST
MCMORROW	DANIEL	GM-1101-14/00	\$46,679	STRATEGIC MATLS MGMT. SPEC.
MCRAE	DOROTHY	GS-0322-04/08	\$18,110	CLERK-TYPIST
MEEKER	TOMMY	GS-1101-13/07	\$47,403	MARKET ANALYST
MILLER	DAVID	WG-5823-10/02	\$24,522	HEAVY MOBILE EOP MECH
MILLER	LESLIE	GS-1101-12/05	\$37,646	MARKET ANALYST
MILLER	RICHARD	GS-1910-09/04	\$25,199	QUALITY ASSURANCE SPEC
MILLER	ROY	GS-2030-12/04	\$36,539	SUPV. STORAGE SPEC. (CHIEF)
MOON	JAMES	GS-1910-11/10	\$36,032	QUALITY ASSURANCE SPEC
MOSER	JACOB	GS-0301-07/01	\$18,726	MANAGEMENT INTERN
MOSES	ARMESY	WG-5705-07/05	\$21,872	TRACTOR OPERATOR
MOYER	MARY	GS-2030-12/04	\$36,539	STORAGE SPECIALIST
MULLENAX	MARVIN	GS-1910-12/08	\$40,967	SUPV OUAL ASSUR SP/CHIEF
NEESE	JAMES	WG-6907-05/03	\$21,162	WAREHOUSE WORKER
NETHERTON	MICHAEL	WG-6907-05/02	\$17,229	WAREHOUSE WORKER (FLOI)
O'BRIEN	ROBERT	GM-2030-15/00	\$66,433	SUPV. STCK. SPEC. (DJR)
OCHELLO	NICHOLAS	WG-6907-06/05	\$23,374	WAREHOUSE WORKER (FLOI)
OLSIOWSKI	WALTER	WG-3566-02/05	\$17,781	CUSTODIAL/LABORER
OLSZEWSKI	JOHN	GS-2030-12/03	\$35,432	SUPV. STORAGE SPEC. (CHIEF)
OSWILL	DONALD	GS-2030-12/06	\$38,753	STORAGE SPECIALIST
PADER	DOUGLAS	GS-1102-12/03	\$35,432	CONTRACT SPECIALIST
PARISI	MICHAEL	WG-4749-05/03	\$22,289	MAINTENANCE WORKER
PARKER	LEE, JR.	WS-4737-10/03	\$31,013	GENERAL ECP. MECH FOREMAN
PARKS	VIRGINIA	GS-0318-05/09	\$19,150	SECRETARY (TYPING)
PASSARETTI	DOMINICK	WS-6907-06/03	\$28,759	WAREHOUSE WORKER FOREMAN
PATRICK	JOHN	GS-1910-11/04	\$30,488	QUALITY ASSURANCE SPEC
PECULLEN	MICHAEL	GM-1910-13/00	\$45,798	SUPV OUAL ASSUR SP/CHIEF
PEYTON	KIMBERLY	GS-0318-03/01	\$13,767	CLERK-TYPIST
PITTANO	JOHN	WG-6907-05/04	\$23,145	WAREHOUSE WORKER
PORRION	PETER	GS-1910-13/05	\$44,765	QUALITY ASSURANCE SPEC
RANKIN	MARILYN	GS-2005-05/07	\$16,142	SUPPLY CLERK
RAUCCI	JAMES	WG-6907-06/05	\$22,832	WAREHOUSE WORKER (FLOI)
RAY	HELEN	GS-0318-05/10	\$19,654	SECRETARY (TYPING)
REEVES	CLARENCE	GM-1910-13/00	\$51,354	SUPV OUAL ASSUR SP/CHIEF
REILLY	KEVIN	GM-0690-14/00	\$48,235	INDUSTRIAL HYGIENIST
REYNOLDS	WESLEY	WG-5823-10/02	\$24,397	HEAVY MOBILE EOP MECH
RINGQUIST	FRANK	GS-1910-12/01	\$33,218	QUALITY ASSURANCE SPEC
ROACH	JOHN	WG-3502-03/03	\$18,553	LABORER
ROLLINS	JANET	GS-1101-12/04	\$36,539	MARKET ANALYST
ROMAN	PETER	GM-0301-15/00	\$63,417	SPECIAL ASSISTANT
ROSTRON	EDWARD	WG-4749-09/03	\$24,543	MAINTENANCE MECHANIC
ROUSH	WILLIAM	WG-4749-05/02	\$19,430	MAINTENANCE WORKER
RUSSELL	JOANNE	GS-2030-13/01	\$39,501	STORAGE SPECIALIST
SANDERS	JOHN	GS-2030-13/04	\$43,452	STORAGE SPECIALIST
SCHIEL	KENNETH	GS-1101-12/06	\$38,753	STRATEGIC MATLS. REPR. SPEC.
SCHOLLE	JOSEPH	GS-2030-12/04	\$36,539	SUPV. STORAGE SPEC. (CHIEF)
SCOTT	CLARENCE	WG-6907-05/01	\$19,138	WAREHOUSE WORKER
SEGREE	THOMAS	WG-3502-03/01	\$17,056	LABORER
SEMRAU	REBECCA	GS-0322-04/07	\$16,213	CLERK-TYPIST

SHEPARD	DANIEL	GS-4749-10/05	\$34,498	MAINT. L. O. FOREMAN
SHIPKOSKY	CHARLES	WG-6907-05/03	\$20,181	WAREHOUSE WORKER
SIEGELMAN	SEYMOUR	GS-1102-12/07	\$39,860	CONTRACT SPECIALIST
SIMMONS	DAVID	WG-4749-09/03	\$24,042	MAINTENANCE MECHANIC
SIMPSON	THOMAS	WG-6907-04/04	\$30,867	WAREHOUSE WORKER FOREMAN
SMITH	KINZY	WG-2810-10/03	\$24,397	ELECTRICIAN (HIGH VOLTAGE)
SMITH	MACKAYE	GS-1910-13/05	\$44,769	QUALITY ASSURANCE SPEC -
SMITH	SCOTT	WG-3502-04/05	\$20,473	LABORER
SMITH	WILBUR	GS-1910-13/05	\$44,769	STORAGE SPECIALIST
SNIEZEK	STANLEY, JR	WG-2810-10/04	\$28,112	ELECTRICIAN (HIGH VOLTAGE)
SORIANO	THOMAS	WG-6907-06/01	\$20,035	WAREHOUSE WORKER
SOUTH	THOMAS	WG-3566-02/05	\$17,781	CUSTODIAL/LABORER
SPINNER-HOLLOM	TONI	GS-0318-06/07	\$20,929	SECRETARY (TYPING)
STAUFFER	GRTON	GS-1101-13/10	\$51,354	STRAT. MTLs. PLAN SPEC.
STECKY	DANIEL	GS-2030-12/10	\$20,766	STORAGE SPECIALIST
STEELE	EARL	GS-2030-11/05	\$31,412	STORAGE SPECIALIST
STEVENS	JOHN	GM-2030-14/00	\$60,683	DIRECTOR, DKS
STEVENS	RICHARD	GS-0880-13/08	\$48,720	MINING ENGINEER
STORM	ANNA	GS-0318-05/03	\$16,796	SECRETARY (TYPING)
SUMK	FREDERICK	GS-2030-12/04	\$36,539	SUPV. STORAGE SPEC. (CHIEF)
SZCZEPANSKI	HARRY	GM-1910-13/00	\$44,771	SUPV QUAL ASSUR SP/CHIEF
TALBOTT	RICHARD	GS-1101-13/06	\$46,086	STRATEGIC MTLs MGMT. SPEC.
TAYLOR	DAVID	GS-2030-11/05	\$31,412	STORAGE SPECIALIST
TGLLIVER	DONALD	WG-3502-03/02	\$17,865	LABORER
TOMASSI	CHARLES	WG-6907-06/05	\$22,832	WAREHOUSE WORKER (FLO)
TRINGHESE	RICHARD	WG-4749-05/01	\$20,557	MAINTENANCE WORKER
TRYON	SALLY	GS-0322-04/01	\$13,513	CLERK-TYPIST
UNDERWOOD	MERYA	GS-1102-12/07	\$39,860	CONTRACT SPECIALIST
UKBANCZYK	DONALD	WG-6907-05/03	\$21,059	WAREHOUSE WORKER
VANEZAS	GERMAN	GS-0801-13/05	\$44,769	GENERAL ENGINEER
VILLAFANE	CARMEN	GS-0318-05/01	\$15,118	SECRETARY (TYPING)
WALKER	DAVID	WG-5701-09/03	\$23,040	MOBILE EQUIP. OPER
WALKER	HOWARD	GS-2030-12/04	\$36,539	SUPV. STORAGE SPEC. (CHIEF)
WALLIS	WORTHY	WG-4749-09/03	\$23,520	MAINTENANCE MECHANIC
WARLICK	DAVID	GS-0110-14/07	\$56,015	ECONOMIST
WASHINGTON	MARION	GS-1101-11/07	\$33,260	STRAT. MTLs. PLAN SPEC.
WEICHAN	CHARLES	WG-6907-06/05	\$22,832	WAREHOUSE WORKER (FLO)
WEIGHTMAN	JOAN	GS-0345-09/03	\$24,435	PROGRAM ANALYST
WESOLOWSKI	DENNIS	GS-1910-12/04	\$36,539	SUPV QUAL ASSUR SF/CHIEF
WHITMAN	RICHARD	WG-6907-05/02	\$20,348	WAREHOUSE WORKER
WHYTE	GEORGE	WG-3566-02/05	\$18,720	CUSTODIAL/LABORER
WILKERSON	DORIS	GS-0318-06/09	\$22,031	SECRETARY (STENO)
WILLIAMS	REGINALD	WG-6907-05/04	\$23,145	WAREHOUSE WORKER
WILLIFORD	OLIN	GS-1910-09/08	\$28,255	QUALITY ASSURANCE SPEC
WINCHELL	KATHY	GS-0322-05/06	\$17,292	SECRETARY (TYPING)
WOLTERS	THEODORE	WG-2810-10/05	\$28,717	ELECTRICIAN (HIGH VOLTAGE)
WORG	CAROL	GS-0318-05/06	\$17,628	SECRETARY (TYPING)
ZARTMAN	JUSTUS	WG-5716-08/05	\$25,169	ENGINEERING EQUIP. OPER.
VACANCY		GS-1910-13/01	\$39,501	QUALITY ASSURANCE SPEC
VACANCY		GS-1101-13/01	\$39,501	STRATEGIC MTLs MGMT. SPEC.
VACANCY		GS-1640-13/01	\$39,501	FACIL. MGMT SPEC.
VACANCY		GS-1101-13/01	\$39,501	STRATEGIC MTLs MGMT. SPEC.

VACANCY	GS-0322-13/01	\$39,501	STORAGE SPECIALIST
VACANCY	GS-1701-13/01	\$39,501	STRATEGIC MTLs MGMT. SPEC.
VACANCY	GS-0334-12/01	\$33,218	COMPUTER PROGRAM ANALYST
VACANCY	GS-0801-12/01	\$33,218	GENERAL ENGINEER
VACANCY	GS-2030-12/01	\$33,218	STORAGE SPECIALIST
VACANCY	GS-2030-11/01	\$27,716	STORAGE SPECIALIST
VACANCY	GS-1101-11/01	\$27,716	STRAT. MTLs. PLAN SPEC.
VACANCY	GS-0018-11/01	\$27,716	SFTY & OCCUP HEALTH SPEC
VACANCY	GS-C345-09/01	\$22,907	PROGRAM ANALYST
VACANCY	GS-1910-09/01	\$22,907	QUALITY ASSURANCE SPEC
VACANCY	GS-0318-07/01	\$18,726	SECRETARY (STENO)
VACANCY	GS-C318-07/01	\$18,726	SECRETARY (STENO)
VACANCY	GS-0318-03/01	\$12,038	CLERK-TYPIST
VACANCY	AG-69C7-04/02	\$18,240	WAREHOUSE WORKER

=====

NUMBER POSITIONS = 278

NATIONAL DEFENSE STOCKPILE SUPPORT POSITIONS

EMPLOYEE'S NAME	GRADE/SERIES	SALARY	POSITION TITLE
FICKER, RODNEY	GM-905-15/00	\$65,752	ATTORNEY
HEJAZI, SHARON	GS-905-11/01	\$27,716	ATTORNEY
GUSS, KRISTIN	GS-343-11/02	\$28,640	MANAGEMENT ANALYST
DAVIS, KENNETH	GM-301-14/00	\$49,711	SUPVR. PROG. SUPP
BISCHOF, PATRICIA	GM-343-13/00	\$43,449	MANAGEMENT ANALYST
JOHNSTON, FLORIA	GS-343-12/06	\$38,753	MANAGEMENT ANALYST
NIETHAMER, JANE	GS-560-12/01	\$33,218	BUDGET ANALYST
CHIDO, HARRIET	GS-343-12/04	\$36,539	MANAGEMENT ANALYST
NOBLE, LENA	GS-303-9/09	\$29,019	STAFF ASSISTANT
CRUMLOY, CHRIS	GS-560-13/06	\$46,086	BUDGET ANALYST
STAKE, CHARLES	GM-905-14/00	\$47,866	ATTORNEY
SLUGG, DAVID	GM-560-14/00	\$62,773	BUDGET ANALYST
EMERY, DONNA	GS-343-12/01	\$33,318	MANAGEMENT ANALYST
BURRKART, S.	GS-343-12/01	\$36,539	MANAGEMENT ANALYST
GIBBONS, T.	GS-343-12/04	\$36,539	MANAGEMENT ANALYST
CHAMBERS, S.	GS-318-5/02	\$16,798	SECRETARY (TYPING)
JOHNSON LAVERNE	GS-318-7/04	\$20,806	SECRETARY (TYPING)
BURLING, CYNTHIA	GS-318-7/04	\$20,806	SECRETARY (TYPING)
BANKS, LARCENIA	GS-318-5/02	\$16,798	SECRETARY
VACANT	GS-501-14/02 01	\$48,235 45,763	MANAGEMENT ANALYST

20 POSITIONS

FEDERAL EMERGENCY MANAGEMENT POSITIONS

EMPLOYEE'S NAME	GRADE/SERIES	SALARY	POSITION TITLE
CORDER, RICHARD	GS-1150-15/05	\$62,227	SENIOR INDUSTRIAL OFFIC
MUNDAY, JUDITH	GS-1150-13/05	\$44,769	INDUSTRIAL SPECIALIST

March 6, 1989

Ms. Fredericka Griffith
Records Officer
Defense Logistics Agency - DLA-XAM
Cameron Station, VA 22304-6100

Dear Ms. Griffith:

Reference communication on the transfer of the General Services Administration (GSA), National Defense Stockpile (DN) records to the Department of Defense (DOD), Defense Logistics Agency (DLA-XAM), under Executive Order 12626 dated July 1, 1988, are herewith.

Although records are not being physically moved at this time, the attached GSA Forms 2039, Files Maintenance Plans, are forwarded with completed Standard Forms 135, Records Transmittal and Receipt, for your signature and receipt to officially transfer custody/accountability from GSA to DLA-XAM. For the number of offices and cubic feet of records involved in the transfer, see attached copy of correspondence from DLA to GSA dated February 22, 1989.

Upon review of the documents enclosed, please sign and forward copies of Standard Forms 135 to this office. If you have any questions or problems, please contact Mae Simms, 535-7938.

Sincerely,

B
Mary L. Cunningham
Chief,
Information Collection
Management Branch

Enclosures

cc: OF/RF
CAIR

CAIR:MSIMMS:hmj:3/6/89:535-7938

ROUTING SLIP													
TO	CO	RW	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10	
NAME/TITLE								CORRES. SYMBOL	RECEIVED				
									INITIAL	DATE			
1.	Feld SIM - Leavin 5-27-5-31-												
2.	Report												
3.	5243 head 48-BK												
4.	Falls Church, VA 22041												
5.	22041 56-43063												
Necessary Action				Recommendation				As Requested					
For Signature				Comment				Secure					
Concurrence				Initial and Return				Your Information					
Approval				Per Conversation				Other (Specify)					
REPLY OR INTERIM REPLY								FOR SIGNATURE OF					
DUE								John Cannon					
REMARKS													

FPRS Security cont. - Jim Calaway 566-1122
535-7525

Sal DNP Cheryl Kates 535-2102
DN (off of Nat'l Defense Stockpile)
DINS
DNP
DNC
DNO 3 Zones
DNI - DN 2
DN 5

FROM	CO	RW	R1	R2	R3	R4	R5	R6	R7	R8	R9	R10
NAME/TITLE								CORRES. SYMBOL		BUILDING, ROOM NO.		
Contract Appeal (CoA)								DN 7				
TELEPHONE NO.								DATE				
2691												

GENERAL SERVICES ADMINISTRATION

GSA FORM 14 (REV. 9-80)

MEMORANDUM
OF CALL



Previous editions usable

TO: MAE June

☒ YOU WERE CALLED BY- ☐ YOU WERE VISITED BY-

Fredrika Griffith
OF (Organization)
Defense Logistics Agency (DLA)

☒ PLEASE PHONE ☐ FTS ☐ AUTOVON
274-6234

☐ WILL CALL AGAIN ☐ IS WAITING TO SEE YOU
☐ RETURNED YOUR CALL ☐ WISHES AN APPOINTMENT

MESSAGE

Re: DN records transfer
- VA's Defense
Stockpile -

RECEIVED BY	DATE	TIME
<u>Maurry</u>	<u>5/25</u>	<u>10:25</u>

63-110 NSN 7540-00-634-4018 STANDARD FORM 63 (Rev. 8-81)
Prescribed by GSA
FPMR (41 CFR) 101-11.6

☆ GPO 1987-181-248/60001

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

~~Federal Records Center~~
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title) DATE
GSA Records Officer 3/3/89

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Mae Simmons 535-7938 (CAFR)

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title) DATE
Richard K. Smith 4/1/89
Mount Analyst (DA-XAM)

Baton Rouge, LA Depot (DNO-7-B)

Fold Line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION (g)	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE (f)	COMPLETED BY RECORDS CENTER			
RG (a)	FY (b)	NUMBER (c)							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO. DISP. (m)
291	88		34.23		Active files transferred to DoD, Defense Logistics Agency, effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

Federal Records Center
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION TRANSFERRING AGENCY OFFICIAL (Signature and title)

DATE

GSA Records Officer

3/3/89

3. AGENCY CONTACT TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Mae Simms 535-7938

(CAIR)

4. RECORDS CENTER RECEIPT RECORDS RECEIVED BY (Signature and title)

DATE

Frederick Buxton
Agent Analyst (DLA-XAM)

4/11/89

Gadsden, AL Depot (DNO-7-G)

Fold Line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION (g)	DISPOSAL AUTHORITY (Schedule and item number) (h)	DISPOSAL DATE (i)	COMPLETED BY RECORDS CENTER			
RG (a)	FY (b)	NUMBER (c)							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO DISP. (m)
291	88		13.5		Active files transferred to DoD, Defense Logistics Agency, effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

NSN 7540-00-634-4093

135-107

Standard Form 135 (Rev. 7-85)
Prescribed by NARA
36 CFR 1228.152

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

~~Federal Records Center~~
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title) DATE
GSA Records Officer 3/3/89

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Mae Simms 535-7938 (CAFR)

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title) DATE
Fredricka Baffeth 4/11/89
Report Analyst (DLA-XR-11)

Zone 3 - Fort Worth, TX (DN-7)

Fold Line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION (g)	DISPOSAL AUTHORITY (Schedule and item number) (h)	DISPOSAL DATE (i)	COMPLETED BY RECORDS CENTER			
RG (a)	FY (b)	NUMBER (c)							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO DISP. (m)
291	88		Active files		Active, Historical, and Records Center files transferred to DoD, Defense Logistics Agency, effective July 1, 1988, per Executive Order 12626.							
			55									
			Records Center									
			107									
					(See attached file plan for transferred record series)							

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

~~Federal Records Center~~

DoD, Defense Logistics Agency

2. AGENCY TRANSFERRING AGENCY OFFICIAL (Signature and title)

DATE

GSA Records Officer

3/3/89

3. AGENCY TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Mae Simms 535-7938

(CAFR)

4. RECORDS CENTER RECEIPT RECORDS RECEIVED BY (Signature and title)

DATE

Frederick B. Griffith
Mgmt Analyst (DLA-XAM)

4/11/89

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

Clearfield, Utah Depot (DNO-7-C)

Fold Line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTED (g)	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE (i)	COMPLETED BY RECORDS CENTER			
RG	EX	NUMBER							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO. DISP. (m)
(a)	(b)	(c)	(d)	(e)	(f)		(h)	(i)	(j)	(k)	(l)	(m)
291	88		17.98		Active files transferred to DoD, Defense Logistics Agency, effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

NSN 7540-00-834-4093

135-107

Standard Form 135 (Rev. 7-85)
Prescribed by NARA
36 CFR 1228.152

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.180.)

Federal Records Center
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)
Maurice R. Grundy for
GSA Records Officer

DATE

3/3/89

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Mae Simms 535-7938

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

Frederick R. Proffitt
Mgmt Analyst (DIA-XAM)

DATE

4/11/89

Stockpile Operations Division (DNO)
Operations Branch
Sharonville Ohio Depot, Zone 2

Fold Line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records) (f)	RESTRICTED (g)	DISPOSAL AUTHORITY (Schedule and item number) (h)	DISPOSAL DATE (i)	COMPLETED BY RECORDS CENTER			
RG (a)	FY (b)	NUMBER (c)							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO. DISP. (m)
291	88		263		Active files transferred to DoD, Defense Logistics Agency effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

NSN 7540-00-834-4083

135-107

Standard Form 135 (Rev. 7-85),
Prescribed by NARA
36 CFR 1228.182

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

Federal Records Center
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title)
GSA Records Officer
DATE
3/3/89

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Mr. Simms 535-7938
DAIR-535-7938

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title)
Meredith Griffith
Mgmt Analyst (DLA-XAM)
DATE
4/11/89

Assistant Commissioner's Office (DN)

Fold Line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	88		3		Active files transferred to DoD, Defense Logistics Agency effective July 1, 1988, per Executive Order 12626.							
					(See attached file plan for transferred record series)							

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.) Federal Records Center DoD, Defense Logistics Agency		5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address) General Services Administration Federal Property Resources Service National Defense Stockpile 18th & F Streets, NW Washington, DC 20405 Stockpile Operations Division (DN-1) Zone 1 New York, NY	
2. AGENCY TRANSFER AUTHORIZATION	TRANSFERRING AGENCY OFFICIAL (Signature and title) <i>[Signature]</i> GSA Records Officer	DATE 3/13/89	
3. AGENCY CONTACT	TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.) <i>[Signature]</i> Mr. Simms 535-7938 (CATK) 535-7938		
4. RECORDS CENTER RECEIPT	RECORDS RECEIVED BY (Signature and title) <i>[Signature]</i> Mgmt Analyst (DLAXAM)	DATE 4/11/89	

Fold Line

6. RECORDS DATA												
ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICT- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	88		Active files 125 Records Center 1,753		Active and Records Center files transferred to DoD, Defense Logistics Agency effective July 1, 1988, per Executive Order 12626. 							

NSN 7540-00-834-4093

135-107

Standard Form 135 (Rev. 7-85)
Prescribed by NARA
36 CFR 1228.152

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

~~Federal Records Center~~
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title) DATE
GSA Records Officer

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Mae Simms 535-7938

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title) DATE
Frederick Puffeth
Mount Analyst (DLA-XAM) 4/11/89

Stockpile Operations Division (DN-1)
Zone 1
New York, NY

COPY

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RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	88		Active files 125 Records Center 1,753		Active and Records Center files transferred to DoD, Defense Logistics Agency effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

NSN 7540-00-834-4093

135-107

Standard Form 135 (Rev. 7-85)
Prescribed by NARA
36 CFR 1228.152

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

Federal Records Center
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title)
GSA Records Officer
DATE

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Mae Simms 535-7938

Stockpile Operations Division (DNO)
Operations Branch
Sharonville Ohio Depot, Zone 2

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title)
Frederick Ruffeth
Mary Ann (DLA-XAM)
DATE
4/11/89

Fold Line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	88		263		Active files transferred to DoD, Defense Logistics Agency effective July 1, 1988, per Executive Order 12626.							
					(See attached file plan for transferred record series)							

NSN 7540-00-834-4093

135-107

Standard Form 135 (Rev. 7-85)
Prescribed by NARA
36 CFR 1228.152

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.) FEDERAL RECORDS CENTER DoD, Defense Logistics Agency		5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address) General Services Administration Federal Property Resources Service National Defense Stockpile 18th & F Streets, NW Washington, DC 20405 Assistant Commissioner's Office (DN)	
2. AGENCY TRANSFER AUTHORIZATION	TRANSFERRING AGENCY OFFICIAL (Signature and title) GSA Records Officer	DATE	
3. AGENCY CONTACT	TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.) Mae Simms 535-7938		
4. RECORDS CENTER RECEIPT	RECORDS RECEIVED BY (Signature and title) <i>Frederick B. Smith</i> <i>Regent (DCA-XAM)</i>	DATE 4/11/89	

Fold Line

RECORDS DATA

ACCESSION NUMBER			VOLUME (vol. #)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTED (r)	DISPOSAL AUTHORITY (Schedule and item number) (h)	DISPOSAL DATE (i)	COMPLETED BY RECORDS CENTER			
RG (a)	FY (b)	NUMBER (c)							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO. DISP. (m)
291	88		3		Active files transferred to DoD, Defense Logistics Agency effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

NSN-7540-00-834-4083

135-107

Standard Form 135 (Rev. 7-85)
Prescribed by NARA
36 CFR 1228.152

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

Federal Records Center

DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION TRANSFERRING AGENCY OFFICIAL (Signature and title) DATE
GSA Records Officer

3. AGENCY CONTACT TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Mae Simms 535-7938

4. RECORDS CENTER RECEIPT RECORDS RECEIVED BY (Signature and title) DATE
Frederick Luff
Mount Analyst (DLA-XAM) 4/11/89

Gadsden, AL Depot (DNO-7-G)

Fold Line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	88		13.5		Active files transferred to DoD, Defense Logistics Agency, effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in FPMR 101-11.410-1 **FORT WORTH, TX**

2. AGENCY TRANSFER AUTHORIZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

Ann S. Bloodworth
Regional Records Officer

DATE

1 MAR 1983

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Sheila A. Brannan Rm 6E03 334-2385 2/25/83

4. RECORDS CENTER RECEIPT

RECORDS RECEIVED BY (Signature and title)

VINCENT L WIESE
Chief, Operations Branch

DATE

MAR 23 1983

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DM-7)
Ft. Worth, TX 76102

Frederick Buppitt
Mont Analyst (DLA-XAM) 4/11/89

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RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291-83-0001			9	1-9 thru 9-9	S&CM contract files. Standard cartons. Purchase contract files. (Bauxite acquisition operation Gregory, TX. Boxes 1-9 contain scale tickets.) Project - March thru Sept 1982 COFF: 9/30/82	N	OAD P 1820.2 31B10	9/30/88 10	B1907516 K2600925 changed 4/11/89			

135-106

RFS

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1
PAGE 1

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration
Ft. Worth, TX

As shown in FPMR 101-11.410-1

2. AGENCY TRANSFER AUTHORIZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

Regional Records Officer

DATE

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Sheila A. Bramman 11A23 334-2385

4. RECORDS CENTER RECEIPT

RECORDS RECEIVED BY (Signature and title)

Mynt Analyst (DLA-XAM)

DATE

4/1/89

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DMI-7)
Ft. Worth, TX 76102

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
			9	1-9 thru 9-9	Standard cartons. Sales and pro- curement contract on various Office of Stockpile Management commodities. Includes scale tickets and logs. Detailed listing attached to DMI-7 copy COFF 9/84 NOTICE - DO NOT LET THESE RECORDS BE DESTROYED AFTER 6 YEARS. RECORDS CENTER NOT ACCEPTING CONTINGENCY DISPOSAL DATES. 31B10 is the proper disposal authority for the procurement portion of these files.	N	OAD P 1820.2 33C10	9/90				

135-106

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

39-82

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration
Ft. Worth, TX

As shown in FPMR 101-11.410-1

2. AGENCY TRANSFER AUTHORIZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)
[Signature]
Regional Records Officer

DATE
11-13-81

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Sheila A. Bramman, 6E03 334-2385

4. RECORDS CENTER RECEIPT

RECORDS RECEIVED BY (Signature and title)
[Signature]
VINCENT L. WIESE
Chief, Operations Branch

DATE
DEC 1 1981

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DMI-7)
Ft. Worth, TX 76102

[Signature]
Monet Analyst (DIA XAM) 4/11/89

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RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	82	0008	15	1-15 thru 14-14	Standard cartons. "Contract" inspection files. Detailed lists attached to DMI-7 cy. COFF 9/30/81	N	OAD P 1820.2 31C1a	ONLY WHEN COMMODITY IS NO LONGER IN NATIONAL STOCKPILE				

[Handwritten]
DH16011
K2702375
changed 4/1/88

RFS

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address to the appropriate records center including zip code)

Federal Archives and Records Center
General Services Administration

Fort Worth, TX

As shown in
FPMR 101-11.410-1

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title)
[Signature]
Regional Records Officer

DATE
11/1/89

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Sheila A. Brannan, 6E03 334-2385

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title)
VINCENT L. WIESE
Chief, Operations Branch

DATE
DEC

5. FROM (Complete the address to the appropriate records center including zip code. The signed copy of this form will be sent to this address)

General Services Administration
Federal Property Resources Svc.
Office of Stockpile Management (DMI-7)
Fort Worth, TX 76102

[Signature]
Monte A. Smith (DCA-44M) 4/11/89

Fold

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
82	82	0007	3	1-3 thru 3-3	Standard cartons. <u>Sales contracts</u> various stockpile commodities (rubber, feathers & down, aluminum, mercury, tungsten, zinc, lead, chromite, copper, ferromolybdenum, manganese, tin, manganese, lithium hydroxide tannin, quartz Detailed listing attached to DMI-7 copy. COFF 9/80	N	OAD P 1820.2 33C10	10/86	20707551 to 20707553 20707553 K2700753 changed 4/11/88	S	A	

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration
Fort Worth, TX

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)
Sheila A. Brannan
Regional Records Officer

DATE
11/6/81

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Sheila A. Brannan, 6E03, 334-2385

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)
VINCENT L. WIESE
Chief, Operations Branch *V. L. Wiese*

DATE
DEC 1 1981

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DMI-7)
Fort Worth, TX 76102

Fredricka Griffith Magnet Analyst 4/11/89

6. RECORDS DATA										COMPLETED BY RECORDS CENTER			
ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.	
RG	FY	NUMBER											
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	
291	82	0006	1	1-1	Standard cartons. <u>Radiation exposure</u> <u>records.</u> Kansas City and Bastrop Defense Depots COFF 9/81	N	OAD P 1820.2 32A70 A 7	10 year 2011 (review prior to destruction)	DI505232 00607355				

RFSR

* per telcon with Norma Mordell
11-9-818

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE	OF
1	1 PAGES

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1. FORM (Under this heading, add the number of copies of the Office retaining the records. The signed receipt of the form will be in the file and record.)

As shown in
FPMR 101-11.410-1

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DMI-7)
Ft. Worth, TX 76102

2. AGENCY TRANSFER AUTHORIZATION	TRANSFERRING AGENCY OFFICIAL (Signature and title) <i>[Signature]</i> Regional Records Officer	DATE <i>11/6/51</i>
3. AGENCY CONTACT	TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.) Sheila A. Brannan, 6E03 334-2385	
4. RECDPS CENTER RECEIPT	RECORDS RECEIVED BY (Signature and title) VINCENT L. WIESE <i>V. L. Wiese</i> Chief, Operations Branch	DATE DEC 1

1981 *Medieval Suffeth*
Mount Analyst (DLA-XAM) 4/11/89 Fold line
ORDS DATA

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTED TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISC.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
		1		1-1	Standard carton. Contract files SCALE TICKETS - Nye, MT. GS-00-DD-(S)-52015	N	OAD P 1820.2 31C1A	ONLY WHEN commodity is no longer in National Stockpile.				
291	-82	-0005			COFF 9/30/81			0/87	DI007663 5 A DI006413 K2704323 changed 4/1/88			

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration
Fort Worth, TX

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

Michael D. J. Dauter
Regional Records Officer

DATE

6-24-81

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Sheila Brannan, DMI-7, 334-2385

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

VINCENT L. WIESE

Chief, Operations Branch

V. L. Wiese

DATE

JUL 19

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DMI-7)
Fort Worth, TX 76102

Frederick Griffith
Mont Analyst DLA/XAM

4/11/89

Fold line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	-81	-0011	1	1-1	Standard cartons. "Contract" inspection files ASBESTOS, Gulfport, BGAD, Regs, Memphis, Ammiston Procurement and Sales Detailed list attached to DMI-7 cy Also included in this box are files on Bauxite, graphite, zinc, bauxite mercury, ferrochrome, manganese (see detailed list of locations) Procurement files COFF: 9/30/80	N	OAD P 1820.2 31C1a Department of Justice 3/14/79, cy attached, subject, "Asbestos Litigation"	WAIVED	ltr. dated 3/14/79			
									C2306743			

PERMANENTLY
WITHDRAWN

135-106

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

Fort Worth, TX

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

Richard D. Patterson
Regional Records Officer

DATE

6-24-81

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Sheila A. Brannan, 6E03 334-3447

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

VINCENT L. WIESE

Chief, Operations Branch

DATE JUL 1

V L Wiese

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DMI-7)
Fort Worth, TX 76102

Fredricka Guffitt
Mount Pleasant (DLA-XAM)

4/11/89

Fold line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	81	0010	3	1-3 thru 3-3	Standard cartons. "Contract" inspection files. Receiving reports 101 thru 340, Denver Federal Center; Inventory records, project files, service contract files, commodity files; DFC narcotics records. Detailed listing attached to DMI-7 file copy. COFF: 9/30/80	N	OAD P 1820.2 31C1a	ONLY when commodity is no longer in National Stockpile				
									<i>CH10411</i> <i>K2609373</i> <i>changed 4/11/89</i>			

135-106

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

1. TO (Complete the address for the appropriate records center serving your area)

**Federal Archives and Records Center
General Services Administration**

Fort Worth, TX

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

Shirley D. Matthews
Regional Records Officer

DATE _____

6-24-81

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Sheila A. Brannan, DMI-7, 334-2385

4. RECORDS CENTER RECEIPT

RECORDS RECEIVED BY (Signature and title)

VINCENT L WIESE

Chief, Operations Branch

DATE _____

JUL 10

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Office of Stockpile Management (DMI-7)
Fort Worth, TX 76102

Frederick Griffith
Mont Alexander (DLA-XAM) 4/11/80

Fold line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
91	81	0009	6	1-6 thru 6-6	Standard cartons. "Contract" inspection files. Sales contracts, voucher registers Detailed lists attached to DMI-7 cy. COFF: 9/30/80	IV	OAD P 1820.2 31C1a	ONLY when commodity is no longer in stockpile.				
									C/500352 K2607965 changed 4/1/88			

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)
Sheila B. Brannan
Regional Records Officer x 2353

DATE

2/8/80

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Sheila Brannan, 6E03 334-3447

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

Frederick Ruffolo
Mgmt Analyst/DCA-VAM

DATE

4/11/89

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Director of Property Management (DMI-7)
Fort Worth, TX 76102

Fold line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	80	0002	4	1 thru 4	MANGANESE commodity files - Listing of files retained in Ofc/Prop Mgmt	N	OAD P 1820.2 31C1a	ONLY when commodity is no longer in stockpile	00406134			
291	89	0003	5	1 thru 5	BAUXITE commodity files - Listing retained in Ofc/Prop Mgmt	N	OAD P 1820.2 31C1a	ONLY when commodity is no longer in stockpile	00406176			
291	80	0004	1	1-1	CHROME commodity files - Listing of files retained in Ofc/Prop Mgmt	N	OAD P 1820.2 31C1a	ONLY when commodity is no longer in stockpile	00406122			
291	80	0005	1	1-1	LEAD commodity files - Listing of files retained in Ofc/Prop Mgmt	N	OAD P 1820.2 31C1a	ONLY when commodity is no longer in stockpile	00406123			
291	80	0006	1	1-1	FLUORSPAR commodity files - Listing of files retained in Ofc/Prop Mgmt	N	OAD P 1820.2 31C1a	ONLY when commodity is no longer in stockpile	00406124			

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 1 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in FPMR 101-11.410-1

2. AGENCY TRANSFER AUTHORIZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)
Rue S. Bloodworth
Regional Records Officer

DATE
5/14/79

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Sheila Brannan, 6E03, 334-3447

4. RECORDS CENTER RECEIPT

RECORDS RECEIVED BY (Signature and title)
Frederick Griffith
Mont Analyst (DLA-XM)

DATE
4/11/89

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Property Management Division (7DMI)
Fort Worth, TX 76102

Fold line

RECORDS DATA												
ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
201-79-0002		2		1-2, 2-2,	LEAD commodity files - Listing of files retained in PMD/FPRS	N	OAD P1820.2 31C1a	ONLY when commodity is no longer in stockpile				
201-79-0005		1		1-1	TIN ANTIMONY commodity files - Listing of files retained in PMD/FPRS	N	OAD P1820.2 31C1a	ONLY when commodity is no longer in stockpile				
201-79-0004		3		1-3, 2-3, 3-3	BAUXITE commodity files - Listing of files retained in PMD/FPRS	N	OAD P1820.2 31C1a	ONLY when commodity is no longer in stockpile				
201-79-0006		4		1-4, 2-4, 3-4, 4-4	MANGANESE commodity files - Listing of files retained in PMD/FPRS	N	OAD P1820.2 31C1a	ONLY when commodity is no longer in stockpile				
201-79-0006		2		1-2, 2-2	FLUORSPAR commodity files - Listing of files retained in PMD/FPRS	N	OAD P1820.2 31C1a	ONLY when commodity is no longer in stockpile				
201-79-0007		1		1-1	S & CM Vouchers - Listing of files retained in PMD/FPRS	N	OAD P1820.2 31C1a	ONLY when commodity is no longer in stockpile				

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

DATE

Luc S. Bloodworth
Regional Records Officer 2858 5/14/79

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Sheila Brannan, 6E03, 334-3447

DRDS
ITER
JEIPT

RECORDS RECEIVED BY (Signature and title)

DATE

Frederick Buffett
Mgmt Analyst (DIA-HAM) 4/11/89

5. FROM (Enter the name and complete mailing address of the office retiring the records. 2 of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
Property Management Division (7DMI)
Fort Worth, TX 76102

Fold line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION (g)	DISPOSAL AUTHORITY (Schedule and item number) (h)	DISPOSAL DATE (i)	COMPLETED BY RECORDS CENTER			
RG (a)	FY (b)	NUMBER (c)							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO. DISP. (m)
281-79-0001			2	1-2, 2-2	<u>ASBESTOS FILES</u> - Listing of files retained in FMD/FPRS. C/O 5/79	N	OAD P1820.2 31C1a and Department of Justice ltr. dated 3/14/79, cy attached, subject, "Asbestos Litigation"	WAIVED	281-79-0001 01600812			

PERMANENT
WITHDRAWN

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1	OF 6 PAGES
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5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)
Sam S. Bloodworth
 Regional Records Officer

DATE
9/27/78

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Phyllis M. Degler, 6E03, 334-3447

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

DATE
10-18-78

DAVID L. PETREE, DIRECTOR

DLA-XAM) GSA
Federal Property Resources Service (7DMI)
Property Management Division
Fort Worth

These files were reaccessed & are ~~not~~ not to be counted on the annual records disposition report

Fold line

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
		7-78-0065	2	1-2	<p>"Contract" inspection files. Case files created as a result of inspecting commodities for compliance with procurement, barter beneficiation, or upgrading specifications. These files include copies of contracts, amendments, and specifications; acceptance and analysis reports; shipping instructions and notices; and related papers. Arranged by commodity and thereunder by contract:</p> <p>COFF Date 12/34</p> <p><u>Aluminum Contracts</u></p> <p>GS-OOP-3791 (SCM)</p> <p>GS-OOP-226 (SCM)</p> <p>GS-OOP-3745 (SCM)</p> <p>GS-OOP-463 (SCM)</p> <p>GS-OO-DS(S)-47636</p> <p>GS-OO-DS-(S)-41034</p>	N	OAD P1820.2 31C1b	<p>Destroy on receipt of notification from the Reg. Dir., FPRS/PMD, that the commodities are no longer stored in the region.</p>				

135-106

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 2 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in FPMR 101-11.410-1 **7NCA**

2. AGENCY TRANSFER AUTHORIZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

DB
Regional Records Officer

DATE

4/14/78

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Phyllis M. Degler, 6E03, 334-3447

4. RECORDS CENTER RECEIPT

RECORDS RECEIVED BY (Signature and title)

David L. Petree
DAVID L. PETREE, DIRECTOR

DATE

5-11-78

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

GSA
Federal Supply Service (7FJI)
Property Management Division
Fort Worth

Fredricka Buppeth
Mgmt Analyst (DCA-XM?) 4/11/89

Fold line

6. RECORDS DATA												
ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
187-78-0024			2	1-2	"Contract" inspection files. Case files created as a result of inspecting commodities for compliance with procurement, barter, beneficiation, or upgrading specifications. These files include copies of contracts, amendments, and specifications; acceptance and analysis reports; shipping instructions and notices; and related papers. Arranged by commodity and thereunder by contract:	N	OAD P1820.2 31C1a	Following receipt of notification that all of the commodities have been removed.				
					COFF Date 10/76							
					A. P. Green Refractories GS-00-DS-(S)-N Harbison-Walker Refr. 83017 GS-00-DS-(S)-70021 A. P. Green Fire Brick Co. GS-00P-S-23509-23519							
			2	2-2	Manganese (Deming) GS-00-DD-(S)-80056 Manganese (Eagle Pass) BSD-SM-62-19-12 Fluorspar (Eagle Pass) (BSD-SM-61-79							

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 2 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in
FPMR 101-11.410-1

7NCA

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

Regional Records Officer

DATE

4/14/78

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Phyllis M. Degler, 6E03, 334-3447

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

DAVID L. PETREE, DIRECTOR

DATE

5-11-78

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

GSA
Federal Supply Service (7FJI)
Property Management Division
Fort Worth

Redeunda Buffeth
Wgmt Analyst (DLA-XAM) 4/11/89

Fold line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
137	-78	-0023	1	1	Depot inspection files. Documents accumulated in inspecting and reporting on the condition and security of materials in storage, including the condition and adequacy of storage facilities. Included are completed inspection reports (GSA Form 226, Notification of Stockpile Inspection, or equivalent form), trip reports, similar documents, and related correspondence. COFF Date 10/76 Cordage - Harahan, Louisiana Gadsden, AL Baton Rouge, LA Pine Bluff, AR Richmond, KY Gulfport, MS Bauxite - Burnside, LA Saline Co, AR (Little Rock) Antimony - Baton Rouge, LA	N	OAD P1820.2 31C5	10/81	60408335- 00300522 Changed 7-31-80 sh K26-051-2-3 Changed 4/11/88			A

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 4 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in
FPMR 101-11.410-1

7NCA

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

DATE

Regional Records Officer

4/14/78

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Phyllis M. Degler, 6E03, 334-3447

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

DATE

DAVID L. PETRER, DIRECTOR

5-11-78

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

GSA
Federal Supply Service (7FJ1)
Property Management Division
Fort Worth

Frederick B. Griffith
Mont Alexander (DLA-XAM) 4/11/89

Fold line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
			3	1-3	Standard Cartons. S&CM sales contracts Documents created in the sale of excess S&CM, including sales through AID	N	OAD P1820.2 33C10	Oct 82 extended to '84				

AGENCY REVIEW FOR CONTINGENT DISPOSAL

THE RECORDS DESCRIBED ARE NOW SCHEDULED FOR DISPOSAL CONTINGENT ON COMPLETION OF SOME ACTION OR EVENT. PLEASE REVIEW THIS ACCESSION TO DETERMINE WHEN THE RECORDS MAY BE DESTROYED AND RETURN THIS FORM INDICATING YOUR APPROVAL OR DISAPPROVAL. IF YOU APPROVE, THE RECORDS WILL BE DESTROYED ON THE DATE YOU INDICATE BELOW. IF YOU DISAPPROVE, PLEASE INDICATE A NEW REVIEW DATE. NO ACTION WILL BE TAKEN ON THESE RECORDS UNTIL THIS FORM IS RETURNED TO OUR OFFICE.

PLEASE ACT PROMPTLY.

DATE OF NOTICE

03/01/85

DISPOSAL DATE

C85

RECORDS DESCRIPTION

ACCESSION NUMBER

137-7E40022

SUBGROUP

FTW

DISPOSAL AUTHORITY

1820.2/33C10

VOLUME
(Cu. ft.)

2

SERIES DESCRIPTION

SALES CONTR

1-2

0 76

ADDRESS OF FEDERAL RECORDS CENTER

FEDERAL ARCHIVES AND RECORDS
CENTER

P.O. BOX 6216

FORT WORTH, TX 76115

DISPOSAL DATE
(Month and year)

☐ APPROVED

☒ See
Reverse
DIS-
APPROVED

NEW REVIEW DATE
(Year)

1990

SIGNATURE

TITLE

DATE

Louise M. Glendon

Secretary

3/14/85

GENERAL SERVICES ADMINISTRATION

GSA FORM 3165 (REV. 3-86)

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 4 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in
FPMR 101-11.410-1

7NCA

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

DATE

Regional Records Officer

9/20/77

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

Phyllis M. Degler, 6E03, 334-3447

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

DATE

DAVID L. PETREE, DIRECTOR

10-14-77

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

GSA

Federal Supply Service (7FJ1)
Property Management Division
Fort Worth

Deborah L. Smith
Mgmt Analyst (DIA-XAM) 4/11/89

Fold line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
137-78-0003			1	1	Standard Cartons. B&CM vouchers-storage facility copies of records documenting the receipt, storage, & shipment of, and accountability for, strategic and critical materials. Included are shipping instructions & notices; receiving reports; over, short, and/or damage reports; memorandum copies of bills of lading, but not issuing office copies; analysis reports; delivery orders; sales releases; shipment orders; stock adjustment reports; reports of survey and property write-offs; and related papers not described elsewhere in this paragraph. COFF Date 9/30/77 LAN Storage Site, Boyles, AL Anniston Army Depot, Anniston, AL Wilson Dam (TVA), Muscle Shoals, AL Holston AAP, Kingsport, TN	N	OAD P 1820.2	Oct 80 Jan '85 see ltr dtd. 7-28 E response dtd 8-14-81				
							32A130a					
											A	

INDEXING AND TRANSMITTAL SLIP

Date

5-25-90

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1. GSA / Mae ~~Simms~~ *Simms*

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

attached on the occasions that
we are removing from your
Record groups 137 and 291 and converting
to Record group 361 (Defense Logistics
Agency)

DO NOT use this form as a RECORD of approvals, concurrences, disposals,
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Carl Hancock

W.H.C. - Juitland

Phone No.

763-7504

5041-102

OPTIONAL FORM 41 (Rev. 7-76)

Prescribed by GSA
FPMR (41 CFR) 101-11.206

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 11 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in FPMR 101-11.410-1 Bldg. 22 - Military Ocean Terminal
Bayonne, N.J. 07002

2. AGENCY TRANSFER AUTHORIZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)
D. HAYWARD
Chief, Inspection Branch

DATE
4/13/77

3. AGENCY CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
S. RUGGIERO
Regional Records Officer 212-264-8260

4. RECORDS CENTER RECEIPT

RECORDS RECEIVED BY (Signature and title)
Frederick Griffith
Major Analyst (DLA-XAM)

DATE
4-11-89

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
FSS/PMD Inspection Branch (2FJI)
26 Federal Plaza, Room 2832
New York, N.Y. 10007

Fold line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cm. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHEET PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
137	77		11	11	Property Management Division Inspection Case Files (See attached)		OAD P 1820.2 31C1	Dec. 1982				

NATIONAL ARCHIVES AND RECORDS SERVICE
DISPOSAL AUTHORITY VERIFICATION REPORT (80)
WASHINGTON NATIONAL RECORDS CENTER

PAGE

05/03/90

FRC	DISPOSAL AUTHORITY	ACCESSION NUMBER	SUB FRZ GRP COD	VOLUME	SP	BEGINNING LOCATION	RSTR	T	C AUTO DISP	DISP DATE	SERIES DESCRIPTION	
W	0413.1/132/24	137-89-0005		8	S	18-70-27-1-4	R	A	N	199207	TRANSP VOUCH	1/86-10/88
W	1820.2/11B25A	137-62A1160		2	S	14-76-19-2-1	R	A	N	1986P	OFCL TRANSMIT LTR TO GSA MANUAL	54-60
W	1820.2/11B25A	137-75-0050		5	S	14-42-53-5-4	R	A	N	1986P	ADMIN MGMT- ORDERS BULLETINS	60-73
W	1820.2/11B25A	137-76-0079		8	S	14-05-20-6-4	R	A	N	1986P	DIRECTIVES	7/70-12/74
W	1820.2/11B25A	137-78-0005		4	S	03-02-15-6-4	N	A	N	1988P		ISS76-77
W	1820.2/11B25A	137-81-0006		5	S	03-34-32-5-4	N	A	N	1991P	DIRECTV	56-80
W	1820.2/11B25A	137-84-0022		2	S	02-37-24-3-5	N	A	N	1993P	DIRECTV CASE FILES	69-10/82
W	1820.2/27D30A	137-71A4797		0	S	14-76-54-1-1	R	A	Y	198910	DP UTILIZ REPTS	69-70
W	1820.2/27E10A	137-71A6697		0	S	14-80-14-2-1	R	A	Y	198910	ADP SYSTEMS FLS BX1-2	66-68
W	1820.2/31C1	137-75E0003		2	S	14-71-54-2-1	R	A	N	1990C	RUBBER SALES BX4-5	CY66-72
W	1820.2/31C1	137-75H0003		0	S	14-71-54-3-6	R	A	Y	198907	RUBBER SALES BX12	CY66-72
W	1820.2/31C1	137-76-0031		2	S	14-72-26-6-1	R	A	N	1990C	CONTR C84 BXS 2-3	1970-74
W	1820.2/31C5	137-75-0012		42	S	14-77-12-6-1	R	A	N	1988C		DEPOT INSPEC69
W	1820.2/31D25	137-71E1545	REG	5	S	14-73-28-2-2	R	A	Y	ABS		BOX8-10 13-14
W	1820.2/31D5	137-75-0049	RGN	8	S	14-33-14-2-1	R	A	N	1988C	REGIONAL FSS FACILITY FILES	46-69
W	1820.2/33A105	137-88-0009		0	S	14-76-06-4-1	R	A	Y	198910	NONCOMPLIANCE FILE	FY84
W	1820.2/33A105	137-88-0010		1	S	14-34-24-3-5	R	A	N	199010	NONCOMPLIANCE FILE	84-9/85
W	1820.2/33A15	137-61A0826	REG	2	S	14-73-10-5-5	R	A	N	1988C	EXCESS PRPTY REQUIRMNT BX5-6	58
W	1820.2/33A75B	137-85-0307		0	S	14-17-44-4-6	N	A	Y	198910	TERM CONTR	FY83
W	1820.2/33A95A	137-86-0017		0	S	14-58-16-3-3	N	A	Y	198910	UTLIZ DISPOS REPORT	FY84
W	1820.2/33D1A2	137-63A0996	REG	3	S	14-73-12-1-1	R	A	N	1986P		REAL PRPTY 55
W	1820.2/50A25	137-89-0301		16	S	17-06-04-4-3	R	A	N	199010	VEH IDENT FILE	FY85
W	1820.2/50A50	137-80-0313		2	S	14-68-44-5-1	R	A	Y	199001	MTR VEH ACC FL	FY77
W	1820.2/50A50A	137-84-0322		0	S	14-34-19-1-6	N	A	Y	198910	MOTOR VEH ACCID LOG	FY83
W	1820.2/50A50A	137-86-0310		1	S	14-50-06-4-5	N	A	N	199010	MOTOR VEH ACCID FILE	FY84
W	1820.2/52A45	137-86-0302		8	S	14-56-22-4-5	R	A	N	199010	TRANSP ASST CASE FILE	FY84
W	1820.2/52A45	137-86-0317		5	S	14-67-17-7-3	R	A	N	199110	TRANSP ASST CASE FILE	FY85
W	1820.2/52B40A	137-73-0042		5	S	03-03-16-3-5	R	A	N	U		PROJ67-70
W	1820.2/60A1	137-89-0041		3	S	14-24-12-3-5	R	A	N	199301	STDZN PROJ FILE	87
W	1820.2/60A15A	137-65A1772		3	S	14-76-23-3-3	R	A	N	1989P	STDZN COMM	39-62
W	1820.2/60A25A	137-71B7402		1	S	14-81-16-6-1	R	A	N	202601	STDZN PLAN FILE BX7	65
W	1820.2/60A5	137-67A3858		2	S	14-75-56-5-5	R	A	N	202501	STDZN DOCS	51-64
W	1820.2/60A5	137-73-0045	REG	2	S	14-51-46-3-5	R	A	N	203001	STDZN DOC FILE	68-69
W	1820.2/60A5	137-80-0023		38	S	14-70-25-7-3	N	A	N	203901	STDZN PROJ FL	1950-1978
W	1820.2/60A5	137-81-0003		4	S	14-69-35-3-3	N	A	N	203901	STDZN DOC FILE	64/9-78
W	1820.2/60A5	137-89-0042		1	S	14-24-12-4-2	R	A	N	204801	STDZN DOC FILE	87
W	1820.2/60B18	137-77-0315	RGN	22	S	14-57-22-3-3	N	A	Y	199001	CONTR	1975-76
W	1820.2/60B1C	137-82-0316		4	S	14-29-45-3-4	N	A	Y	199001	CONTR FILES	FY81
W	1820.2/60B80	137-71F1545	REG	1	S	14-73-26-2-3	R	A	N	ABS	LAB SAMPLE REGSTR BX15	FY71
W	1820.2/61B110	137-71A7008	REG	22	S	14-76-56-3-3	R	A	N	ABS	PUR ORD	69-70
W	1820.2/61B110	137-76-0307	REG	25	S	14-79-01-4-1	R	A	Y	199001		CONTR70-73
W	1820.2/61B110	137-80-0024		0	6	13-63-22-3-2	N	A	Y	199001	CONTR	FY79
W	1820.2/61B110	137-80-0025	ABS	85	S	14-24-25-2-1	N	A	N	ABS	CONTR	FY79
W	1820.2/61B110	137-80-0028	ABS	40	6	14-19-16-2-5	N	A	N	ABS	CONTR	FY79
W	1820.2/61B110	137-80-0315		14	S	14-22-22-6-1	N	A	Y	199001	CONTR	FY79
W	1820.2/61B110	137-81-0002	ABS	3	S	13-85-22-5-3	N	A	N	ABS	PUR CONTR FL	FY79
W	1820.2/61B110	137-81-0105	ABS	37	S	14-74-28-1-3	R	A	N	ABS	PURCH & CONTR	FY79
W	1820.2/61B110	137-82-0006		18	S	14-59-34-6-1	N	A	Y	199001	CONTR	FY79

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

TO BE CO

PLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

RECORD GROUP NO.

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

SIGNATURE

76-A-268

137

DATE RECORDS RECEIVED

TITLE

B. K. Jennings, Chief

6/20/75

FROM: (Name and address of Agency transferring records)

GSA, Federal Supply Service
Property Management Division - 7FJ
Fort Worth

TO: Acquisition & Disposal Branch

7NCA

Nedricka English
Mgmt Analyst (DLA)
4/11/89

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

None

2. SQUARE FEET OF SPACE CLEARED

A. OFFICE

2

B. STORAGE

3. A. FILE CABINETS (No.)

27

FILING EQUIPMENT EMPTIED

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

4. CUBIC FEET OF RECORDS
TRANSFERRED

2

5. NAME OF AGENCY CUSTODIAN OF RECORDS

Wanda Donaldson

6. BUILDING AND ROOM NO.

FOB, Room 6E03

7. TELEPHONE NO.

3447

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

10. TITLE

Records Officer

11. DATE

7/29/75

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)14. DISPOSAL AUTHORITY
(Schedule and Item No.)

All Contracts

S&CM Commodity File: (Receiving Reports)

COFF as of
Jun 30, 1974

31C1a

163937

1

Correspondence 1949-1960

Antimony - #BSD-SM-62-1

Cobalt - #SCM-TS-25128

Fluorspar - #GS-00P-3610 & 3640

Fluorspar - #GS-00P-660 & 2748

Fluorspar - #GS-00P-660, 3610, 3640, & 2748

Lead - #GS-00P-10677 & 18436-3

Lead - #19685

Lead - #19811

Lead - #22316, 22317

Lead - #BSD-SM-58-24

Lead - #BSD-SM-58-12

Lead - BSD-SM-58-21 & 24

Lead - BSD-SM-58-26

Lead - BSD-SM-58-31

Lead - BSD-SM-59-50 (Pigs)

Lead - BSD-SM-59-50 (Ingots)

Lead - SCM Supp Contracts 58 & 59

Lead - GS-00P-10550, 10590, & 10631

Lead - GS-00P-10653, 10677, & 18107

Lead - GS-00P-18152

Lead - GS-00P-18314, 18435

Lead - #18612

Lead - GS-00P-18800

Lead - #19682

Lead - #19684

Lead - #19813

Lead - #22300

Lead - #22468

Lead - #22477

Lead - #22479

Lead - #22480

Lead - GS-00P-10723 & 18237

STANDARD FORM 135
JULY 1961 EDITION

(Use Standard Form 135A for continuation sheets)

135-105

U.S. GOVERNMENT PRINTING OFFICE: 1967 O-255-153 (73-6)

RECORDS TRANSMITTAL
AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

176-A-267

RECORD GROUP NO.

137 137

SIGNATURE

B. K. Jennings

DATE RECORDS RECEIVED

8/20/75

TITLE

B. K. Jennings, Chief
Accession & Disposal Branch

INSTRUCTIONS
Send original and two copies to appropriate
Federal Records Center.
EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

FROM: (Name and address of Agency transferring records)

GSA, Federal Supply Service
Property Management Division - 7FJ
FT. WORTH

TO: Federal Records Center, GSA

Fredenka Griffith
Mgmt. Briefing (DLA)

POSTED

1975

4/11/8

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

None

New Location K26 10361 dated 4-1-88

2. SQUARE FEET OF SPACE CLEARED

3. FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

2

B. STORAGE

A. FILE CABINETS (No.)

2/1

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

2

5. NAME OF AGENCY CUSTODIAN OF RECORDS

Wanda Donaldson

6. BUILDING AND ROOM NO.

FOB, 6E03

7. TELEPHONE NO.

334-3447

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

B. K. Jennings

10. TITLE

Records Officer

11. DATE

7/29/75

12. BOX NUMBERS

FRC ONLY

13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES

(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

All Contracts CORR as of Jun 30, 1974

S&CM Contracts: (packaged material)

GS-00-DS-(S)-93429 (Antimony) - Gulfcoast Lead Co.

-93829 (Antimony) - Gulfcoast Lead Co.

Solicitation of Offers for Antimony (DMS-MET-113)

GS-00-DS-(S)-01021 (Asbestos) - North American Asbestos Corp.

01074 (Asbestos) - "

01004 (Asbestos) - "

01093 (Asbestos) - "

01122 (Asbestos) - Huxley Barter Corp.

01166 (Asbestos) - "

01233 (Asbestos) - North American Asbestos Corp.

01276 (Asbestos) - "

01333 (Asbestos) - Sepco Corp.

01348 (Asbestos) - North American Asbestos Corp.

13034 (Asbestos) - "

13092 (Asbestos) - "

13095 (Asbestos) - "

13139 (Asbestos) - "

13142 (Asbestos) - Metate Asbestos Corp.

13170 (Asbestos) - North American Asbestos Corp.

13180 (Asbestos) - "

13194 (Asbestos) - Newkem Products Corp.

13204 (Asbestos) - North American Asbestos Corp.

13231 (Asbestos) - "

13234 (Asbestos) - "

13275 (Asbestos) - "

23018 (Asbestos) - "

33C10

D = (100 6 yrs)

Juditha Buffett
Thyrt Analyst
(DRA-XAM) 4-11-89

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-382

TRANSMITTAL OF GOVERNMENT RECORDS
(CORRECTED SUBMISSION)

ACCESSION NO.
59A 82
RECORD GROUP NO.
291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)		2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)	
General Services Administration Inspection Div., Defense Materials Service 250 Hudson Street, New York 13, N. Y.		Same	
3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)		TITLE	DATE
(Mrs.) Ann B. Talbot <i>Ann Talbot</i>			** August 11, 1958
4. CUSTODIAN OF RECORDS IN TRANSFERING AGENCY (Name, address, and telephone number)			

** This is a correction of SF 134 and 135 originally submitted 7-30-58.

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

This Accession covers Inspection and Testing Records of the Defense Materials Service, consisting of numerical contract files for items purchased for the National Stockpile under the Strategic and Critical Materials, DPA and Barter (CCC) PROGRAMS.

The contract records of Inspectors of the Division are also included.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All Programs: Restricted to persons authorized by GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE? <input checked="" type="checkbox"/> YES (If "yes," identify schedule) Part V, Subsection 5-5. <input type="checkbox"/> NO	8. CUBIC FEET OF RECORDS TRANSFERRED 26	9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY
---	---	--

10. SQUARE FEET OF SPACE RELEASED	LOCATION
Office: 18 Storage: 10	250 Hudson Street, 13th Floor North

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	4				Corrugated Paper - storage
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

9/23/58

General J. H. Morgan
Chief, Accessioning Section

FEDERAL RECORDS CENTER
Room 202-Federal Building
1301 Washington Street

Fredericka Buxitt
Mgmt Analyst (DEA HAM)
4-11-89

Chief, Federal Records Center, FBI

Mr. J. Edgar Hoover, Director, Federal Bureau of Investigation
Department of Justice, 1933-1934

Accession No. 100-100

Transportation & Public Utilities Service, FBI

In subject accession, RF 100, the statement is made that the records are covered by FBI Record Disposal Standard Part V, Section 3-3, which states:

While this standard is applicable to the records of FBI, it will not apply to the records of the Department of Justice, FBI. In the Inspection Division, FBI records are packed in 100 containers through 1999. These records were loaned to FBI (formerly FBI) in 1999 for research in connection with the investigation of the 1999 riot. The disposal standard for these records is Part V, Section 3-3, which states: CONFIDENTIAL NOT AUTHORIZED.

Chief, Bureau, 1933-1934

Chief, Administrative Facilities Division, FBI
Dep. of Records File
RF 100

Robert Ent. 67

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration, Inspection
Division, Defense Materials Service
250 Hudson Street, New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Summary

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

(Mrs.) Ann B. Talbott

Ann Talbot

TITLE

Chief, Assignment and Control Section

DATE _____

June 28, 1957

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

9. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

This Accession covers Inspection and Testing Records in connection with the Strategic and Critical Materials, DPA and Barter Programs - also Stockpile Storage Inspection Case Files. Some individual inspector's files are also included.

Applicable Records Retention and Disposal Standards: Part V, Subsection 5-5, paragraphs noted on each page, summary on reverse side this SF 135. For purposes of R and DS, please use transmittal date as completion date.

(Due to reorganization and relocation, resulting in immediate re-use of vacated cabinets, there is no report on square feet of space released.)

Total number of containers: 46.

8. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All Programs: Restricted to Persons Authorized by GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule) **Part V, Subsection 5-5.**

☐ NO

8. CLINIC FEET OF RECORDS TRANSFERRED

~~47-84~~ 46

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY	
--	--

18. SQUARE FEET OF SPACE RELEASED

Office

١٦

Store & Share

12

LOCATION

FILING EQUIPMENT (Enter, where applicable, quantity of each type):

FILING CABINETS

TRANSFER CASES

OTHER
(Specify)

1PTIED AND RETAINED AT AGENCY

ORDS SHIPPED IN

WE RETURNED

IF SHELVING EMPTIED AT AGENCY

DO NOT WRITE BELOW THIS LINE

SCRIBED RECORDS WERE RECEIVED
DAMAGED CONTAINERS, ETC.

July 23

, 19 57

FEDERAL RECORDS CENTER ADDRESS

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

584243

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

GENERAL SERVICES ADMINISTRATION
Inspection Division, Defense Materials Service
250 Hudson Street, New York 13, N.Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

LOCATION: Mica Inspection Unit
Harborside Warehouse
Unit 2, Seventh Floor

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Ann Talbott

TITLE

34 EXCHANGE PLACE
JERSEY CITY, N. J.

DATE

March 5, 1958

Ann B. Talbott, Chief, A&C Section

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

Murray S. Hyman, Chief, Inspection Branch

Harborside Warehouse, Jersey City, N.J.

Henderson 2-8500

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

This Accession contains MICA INSPECTION CASE FILES under the Strategic and Critical Materials Program.

Applicable Records Retention and Disposal Standards: Part V, Subsection 5-5, Paragraph 2b: "DISPOSAL NOT AUTHORIZED".

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Restricted to Persons Authorized by GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule) Part V, Subsection 5-5
☐ NO

8. CUBIC FEET OF RECORDS TRANSFERRED

5

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office

6

Storage

1 cabinet immediately

LOCATION

Harborside Warehouse, Unit 2, 7th Floor
Jersey City, N. J.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	1-4dr. cab.				
RECORDS SHIPPED IN	FRC cartons				
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED

March 19, 1958

SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

VJ Mazzanna

TITLE

Chief Accessioning Sect

FEDERAL RECORDS CENTER ADDRESS

STANDARD FORM 135
APRIL 1963
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration
Inspection Division, Defense Materials Service
250 Madison Street, New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

(Mrs.) Ann B. Talbott

TITLE

Chief, Assignment and
Control Section

DATE

January 10, 1958

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

This Accession covers Inspection and Testing Records in connection with the Strategic and Critical Materials, DPA and Barter Programs - also Stockpile Storage Inspection Case Files. Some individual inspector's files are also included.

Applicable Records Retention and Disposal Standards: Part V, Subsection 5-5, paragraphs noted on each page.

For purposes of R and DS, please use transmittal date as completion date.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All Programs: Restricted to Persons Authorized by GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)
☐ NO

Part V, Subsection 5-5.

8. CUBIC FEET OF RECORDS TRANSFERRED

38

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office

Storage

LOCATION

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	6				
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

Jan 27 1958

TURE

TITLE

FEDERAL RECORDS CENTER ADDRESS

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

DO NOT USE THIS BOX

ACCESSION NO.

55A37

RECORD GROUP NO.

137

TRANSMITTAL OF GOVERNMENT RECORDS

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration - Federal Supply Service - Inspection Division

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Ann M. Talbot

TITLE

Chief, Assign. & Control Br.

DATE

6-30-54

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Master Contracts - European Aid Program, Strategic & Critical Materials, M.S.P. Contract Files

Inspector's Files - European Aid Program, Strategic & Critical Materials, M.S.P. Contracts, Purchase Orders, Scheduled Contracts, Mica Program

Carton containing various miscellaneous reports & correspondence relative to various SCM contracts and Inspector's Subway Vouchers

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

SCM-TS restricted - others ~~none~~

AUTHORIZED G.S.A. EMPLOYEES.

7. CUBIC FEET OF RECORDS TRANSFERRED

47

8. SQUARE FEET OF SPACE RELEASED

34 5/6

OFFICE

STORAGE

9. DOES SHIPMENT CONTAIN NONRECORD MATERIAL?

☐ YES

☒ NO

10. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES

☐ NO

(If "yes," identify schedule)

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

RECORDS SHIPPED IN:

FILING CABINETS

TRANSFER CASES

XXXX

FRC CONTAINERS

OTHER (Specify)

TO BE RETURNED:

FILING CABINETS

TRANSFER CASES

OTHER (Specify)

EMPTIED AT AGENCY BY THIS TRANSFER:

6 METAL, 4-DR

FILING CABINETS

TRANSFER CASES

SHELVING (Linear feet)

OTHER (Specify)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

SHORTAGES, DAMAGED CONTAINERS, ETC.

(Do not write below this line)

7/26/54

FEDERAL RECORDS CENTER
Room 302-Federal Building
641 Washington Street
New York 14, N.Y.

SIGNATURE

TITLE

FEDERAL RECORDS CENTER

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

57 A 239

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration, Inspection
Division, Defense Materials Service
250 Hudson Street, New York 13, N.Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

GSA, Inspection and/or Quality Control
Division, Federal Supply Service
250 Hudson Street, New York 13, N.Y.

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

(Mrs.) Ann B. Talbott

Chief, Assignment and
Control Section

June 28

January 28, 1957

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Master Contract Files (Inspection Records) Strategic and Critical Materials
Program, Defense Materials Program and Barter Program Containers numbers 1
through 24;

Inspectors' Contract Files (Inspection Records) same programs as listed above,
Containers numbers 25 through 46;

Miscellaneous subject and contract numbered CRUDE RUBBER files, containers
numbers 47 and 48; Rubber STORAGE warehouse files, containers No. 49 and 50;

TRAVEL documents Oct. 1951 through June 1955; Travel Vouchers Jan. 1954 through
March 1956, April 1955 through June 1956, containers 51, 52 and 53.

(Form purposes of Retention and Disposal Standards use transmittal date as completion date)
RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All Programs listed above: RESTRICTED TO PERSONS AUTHORIZED BY GSA

ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)
☐ NO

Part V 5-5

8. CUBIC FEET OF RECORDS TRANSFERRED

53

9. CUBIC FEET OF RECORDS DISPOSED
OF IN AGENCY

SQUARE FEET OF SPACE RELEASED

Office

Storage

LOCATION

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY					
RECORDS SHIPPED IN	4 1/2 - 4 dr.				
TO BE RETURNED	Approx.				
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

ABOVE-DESCRIBED RECORDS WERE RECEIVED
TAGS, DAMAGED CONTAINERS, ETC.

2/11/57

Room 642 Federal Building
642 Washington Street
New York 14, N.Y.

RE

TITLE

FEDERAL RECORDS CENTER ADDRESS

Chief, Records Sect.

Judith A. Giffitt
Mgmt Analyst
(DLA-XAM) 4-11-89

STANDARD FORM 135
APRIL 1963
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

56 A 199

RECORD GROUP NO.

157

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

Gen. Serv. Adm. - FSS - Inspection Div.
250 Hudson Street
New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Ann B. Talbott

TITLE

Ann B. Talbott

Chief, Assign&Control Div.

DATE

2/1/56

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Master Contracts: - Foreign Aid Program, Strategic And Critical Materials Program, GSF & PPUD Programs, Mica Inspection and Grading Reports, Crude Rubber, Steamer Manifests and S&CM Storage Files.

Inspector's Files: - Same Programs As Above.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Strategic Materials Restricted: - Others, Authorized GSA Employees

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)
☐ NO

8. CUBIC FEET OF RECORDS TRANSFERRED

48

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office

30

Storage

LOCATION

13th Floor, North
250 Hudson Street
New York 13, N.Y.

11. LING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	5 1/2	4 Dr.			
RECORDS SHIPPED IN					FRC Containers
RETURNED					
OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

12. DESCRIBED RECORDS WERE RECEIVED

Feb. 23

19 56

13. DAMAGED CONTAINERS, ETC.

for S. Incullo per

TITLE

Chief

FEDERAL RECORDS CENTER
641 Washington Street
New York 14, N.Y.

U.S. GOVERNMENT PRINTING OFFICE 16-58454-2

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

57A53

RECORD GROUP NO.

137

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

Gen'l. Serv. Adm. - FSS - Inspection Div.
250 Hudson Street
New York 13, N.Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Ann B. Talbott

TITLE

Chief, Assignm't & Control Div. 7/31/56

DATE

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Master Contract Files; Strategic and Critical Materials, Foreign Aid Programs, DMPA contract material, Barter Program; (Cartons 2FI-394 through 415 and Cartons 2FI-434 through 442); Purchase Orders (stores stock and direct delivery) (Cartons 2FI-416 through 433).

Rubber Releases, Layouts, related documents (Cartons 2FI-443 through 459)

Laboratory Tests Registers (Carton 2FI-461)

National Stockpile Rubber Files (Carton 2FI-461/462)

Travel Vouchers (2FI-463)

Monthly Time and Activity Reports (GSA Form 333) (Carton 2FI-463/464)

(NOTE: Since the contracts listed herein include various beginning and completion dates, please consider date of transmittal as completion date for purposes of applying "Records Retention and Disposal Standards".

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Strategic Materials Restricted: - Others, Authorized GSA Employees

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)

☐ NO

8. CUBIC FEET OF RECORDS TRANSFERRED

72

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office
18

Storage
15

LOCATION

13th Floor, North
250 Hudson Street
New York 13, N.Y.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	3-1/2-4 Dr.				
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

FEDERAL RECORDS CENTER
Room 302-Federal Building
641 Washington Street
New York 14, N.Y.

SIGNATURE

Peter S. Jacallos

TITLE

Chief

FEDERAL RECORDS CENTER ADDRESS

Frederick Griffith
Mgmt Analyst
(DLA-XAM) 4-11-89

STANDARD FORM 134
 APRIL 1953
 PRESCRIBED BY GENERAL
 SERVICES ADMINISTRATION
 REG. 3-IV-302

FROM (Name of agency)

Gen. Serv. Adm. - FSS - Inspection Division

ADDRESS OF AGENCY

250 Madison Street, New York 13, N.Y.

AGENCY WHICH CREATED RECORDS

TOTAL NO. OF CONTAINERS

None

FRC ACCESSION NO.

RECORD GROUP NO.

DATE

87

RECORDS SHELF LIST

AGENCY CONTAINER NO.	FRC CONTAINER NO.	DESCRIPTION AND DATE			
2FI - 277	158810	Rubber Contracts - GS-OOP-SCM	4221	-	6089
2FI - 278	811	"	6090	-	6122
2FI - 279	812	"	6123	-	6186
2FI - 280	813	"	6189	-	6240
2FI - 281	814	"	6241	-	6303
2FI - 282	815	"	6306	-	6360
2FI - 283	816	"	6361	-	6421
2FI - 284	817	"	6422	-	6486
2FI - 285	818	"	6489	-	6549
2FI - 286	819	"	6550	-	6608
2FI - 287	820	"	6602	-	6661
2FI - 288	821	"	6662	-	6719
2FI - 289	822	"	6720	-	6780
2FI - 290	823	"	11000 - 11005	-	11006
2FI - 291	824	"	11006	-	11056
2FI - 292	825	"	11057	-	11126
2FI - 293	826	"	11127	-	11190
2FI - 294	827	"	11191	-	11257
2FI - 295	828	"	11258	-	11319
2FI - 296	829	"	11320	-	11383
2FI - 297	830	"	11384	-	11448
2FI - 298	831	"	11449	-	11517
2FI - 299	832	"	11518	-	11576
2FI - 300	833	"	11577	-	11632
2FI - 301	834	"	11673	-	11765
2FI - 302	835	"	11766	-	11866
2FI - 303	836	"	11867	-	11980
2FI - 304	837	"	13006	-	13251
2FI - 304	837	Completed Contracts - Foreign Aid			
		GS-O3P-EC	537	-	4034
		GS-OOP-EC	18484	-	19769
2FI - 305	838	Completed Contracts - Foreign Aid			
		GS-OOP-EC	19779	-	19972
		GS-O3P-EC	23	-	2222
2FI - 306	839	Completed Contracts - Foreign Aid			
		GS-O3P-EC	2263	-	2993
		GS-OOP-EC	15168	-	16299
2FI - 307	840	Completed Contracts - Foreign Aid			
		GS-OOP-EC	16319	-	19021
2FI - 308	841	Completed Contracts - Foreign Aid			
		GS-OOP-EC	19123	-	20095
		GS-O3P-EC	3034	-	4082
		SCM - TS			19763

*6538 Not at
 Rb - but
 in TPUS.
 2-27-58*

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACT. ON NO.

54 A 48

RECORD GROUP NO.

137

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration, Federal Supply Service, Inspection Division.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

A. B. Talbott, Chief, Assign. & Cont. Br. Chief, Assign. & Cont. Br.

7/15/53

6/30/53

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (FVAH including dates. Use reverse if additional space is required)

Folders on European Aid Program (OS-00P-EC) from 1948 thru present.

Contracts on various Fibre Sales - Folders on Contract No. DA-FPS-92430 which includes Contracts, Standards & Specs., Expediter's Reports, Application for Shipping Instructions, Drawings, Charts, Operating Manual. - File Folders on Master Rubber Contracts - Steamer Manifests from AA thru STE - Outport Inspection Reports, Photostats of Inspection Reports on Rubber in Storage and Rubber Contracts of West Coast Dealers (SCL-75-PCA)

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

SCL-75 restricted - others none

7. CUBIC FEET OF RECORDS TRANSFERRED

3035-31

8. SQUARE FEET OF SPACE RELEASED

35

OFFICE

STORAGE

9. DOES SHIPMENT CONTAIN NONRECORD MATERIAL?

☐ YES

☒ NO

10. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES ☐ NO (If "yes," identify schedule)

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

RECORDS SHIPPED IN:

FILING CABINETS

TRANSFER CASES

FRC CONTAINERS

20 Standard Cartons - 1 cu.ft. vol.

3 Standard Cartons - 1.5 cu.ft. vol.

TO BE RETURNED:

FILING CABINETS

TRANSFER CASES

OTHER (Specify)

EMPTIED AT AGENCY BY THIS TRANSFER:

5 METAL

FILING CABINETS

TRANSFER CASES

SHELVING (Linear feet)

OTHER (Specify)

(Do not write below this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

TITLE

FEDERAL RECORDS CENTER

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

RECORD GROUP NO.

54A47
137

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration - Federal Supply Service - Inspection Division

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZED TO TRANSFER (Signature)

TITLE

DATE

A. E. Talbot, Chief, Assign. & Cont. Br.

Chief, Assign. & Cont. Br.

7/15/59

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Inspector's Files on various Strategic & Critical Materials Contracts. (OS-OP-SCM & SCM-TS)

Inspector's Files on various National Stockpile contracts (NSP)

Inspectors Files on various Purchase Orders that have been considered completed.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

SCM-TS Restricted - others none

7. CUBIC FEET OF RECORDS TRANSFERRED

9

8. SQUARE FEET OF SPACE RELEASED

10.5

OFFICE

STORAGE

9. DOES SHIPMENT CONTAIN NONRECORD MATERIAL?

☒ YES

☐ NO

10. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☐ YES

☐ NO

(If "yes," identify schedule)

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

RECORDS SHIPPED IN:

TO BE RETURNED:

EMPTIED AT AGENCY BY THIS TRANSFER:

FILING CABINETS

TRANSFER CASES

FRC CONTAINERS

☒ Standard cartons

OTHER (Specify)

FILING CABINETS

TRANSFER CASES

OTHER (Specify)

FILING CABINETS

TRANSFER CASES

SHELVING (Linear feet)

OTHER (Specify)

(Do not write below this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

19

SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

TITLE

FEDERAL RECORDS CENTER

Frederick Griffith
Mgmt Analyst 100 (DCA-X44)
4-11-84

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

544111

RECORD GROUP NO.

137

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

FROM (Name and address of agency transferring the records)

Gen. Serv. Admin. - F&S - Inspection Div. (Harborside Whse., Unit 2, Jersey City, NJ)

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

Ann B. Talbott

Chief, Assign. & Control Branch

12/14/53

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

All records connected with the operation of the Mica Program at the Harborside Warehouse, Unit 2, Jersey City, N.J. - This includes Mica Contracts, Mica Grading Reports - Mica Inspection Reports - Mica Sort Records - Mica Inventory Reports - Mica Case Records and Miscellaneous Correspondence.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

SCM-TS restricted - others none

7. CUBIC FEET OF RECORDS TRANSFERRED

35

8. SQUARE FEET OF SPACE RELEASED

42

OFFICE

STORAGE

9. DOES SHIPMENT CONTAIN NONRECORD MATERIAL?

☒ YES

☐ NO

10. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES

☐ NO

(If "yes," identify schedule)

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

RECORDS SHIPPED IN:

11 FILING CABINETS

11 TRANSFER CASES

11 FRC CONTAINERS

OTHER (Specify)

TO BE RETURNED:

11 FILING CABINETS

11 TRANSFER CASES

OTHER (Specify)

EMPTIED AT AGENCY BY THIS TRANSFER:

6 METAL

11 FILING CABINETS

11 TRANSFER CASES

11 SHELVING (Linear feet)

OTHER (Specify)

(Do not write below this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

12-14-53

19

SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

Robert A. Magzerino

TITLE

FEDERAL RECORDS CENTER

Chief Accessioning Sec

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

Frederick Buffington
IDA-XAM
4-11-89

NOT USE THIS BOX FOR
549-132

TRANSMITTAL OF GOVERNMENT RECORDS

RECORDS GROUP NO. 137

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration - Federal Supply Service - Inspection Division

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Ann B. Talbott

TITLE

Chief, Assign.&Control Br.

DATE

12-11-53

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Inspector's Files - European Aid Program, Strategic & Critical Materials, Purchase Orders and Scheduled Contracts

Master Contracts - European Aid Program, Strategic & Critical Materials, Purchase Orders and Scheduled Contracts

Miscellaneous matter which includes: Requisitions, Shipping Instructions on the ECA and SCAM Program, Rubber Inspection Reports (GS-COP (D)), and a few completed Files (Inspector's) on ECA-SCM and P.O's.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

SCM-TS restricted - others none

7. CUBIC FEET OF RECORDS TRANSFERRED

40

8. SQUARE FEET OF SPACE RELEASED

47

OFFICE

STORAGE

9. DOES SHIPMENT CONTAIN NONRECORD MATERIAL?

☐ YES

☐ NO

10. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES

☐ NO (If "yes," identify schedule)

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

RECORDS SHIPPED IN:

FILING CABINETS

TRANSFER CASES

XXX FRC CONTAINERS

OTHER (Specify)

TO BE RETURNED:

FILING CABINETS

TRANSFER CASES

OTHER (Specify)

EMPTIED AT AGENCY BY THIS TRANSFER:

FILING CABINETS

TRANSFER CASES

SHELVING (Linear feet)

OTHER (Specify)

(Do not write below this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

19

SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

TITLE

FEDERAL RECORDS CENTER

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

DO NOT USE THIS BOX

SION NUMBER

RECORD GROUP NUMBER

TRANSMITTAL OF GOVERNMENT RECORDS

137

INSTRUCTIONS - Submit original and 3 copies to Federal Records Center in advance of each shipment. Be sure all blanks are filled in.

FROM (Name of agency)

DATE

Gen. Services Adm., Federal Supply Service, Inspection Div.

December 29, 1952

ADDRESS OF AGENCY

250 Hudson Street New York 13, N.Y.

AGENCY CREATING RECORDS IF DIFFERENT THAN SHIPPING AGENCY

(Same)

NAME OF PERSON RELEASING RECORDS (Type or print)

SIGNATURE OF PERSON RELEASING RECORDS

Ann Talbott, Chief, Assignment & Control Br.

Ann B. Talbott

DESCRIPTION OF RECORDS

SCM - Mica Grading Reports - Inspectors Daily Reports & Itineraries

Misc. & Reading File - Rubber File Folders - General File - N.S.P.

Regular Mica & Quartz - European Aid - Fibre Sales Contracts

Destroy

9 Cartons

53A-295

Ch. 29.

INCLUSIVE DATE OF RECORDS

FROM

1944

TO

1951

RESTRICTIONS ON USE OF RECORDS (If no restrictions write "none")

SCM-TS Restricted - others none

CUBIC FEET OF RECORDS SHIPPED

37

TYPE OF CONTAINERS USED

Standard

METHOD OF SHIPMENT

☐ BILL OF LADING

☐ REGISTERED

☐ INSURED

NUMBER

☐ RAILROAD (Freight)

UNITED STATES MAIL

OTHER

☐ RAILWAY EXPRESS

☐ FIRST CLASS

☐ COMMERCIAL TRUCK

☐ PARCEL POST

☒ GOVERNMENT CONVEYANCE

☐ REGISTERED MAIL

☐ RECORDS CENTER VAN

☐ INSURED MAIL

STATE NUMBER AND TYPE OF FILING EQUIPMENT WHICH CONTAINED RECORDS

SHOULD THIS EQUIPMENT BE RETURNED?

Approx. 6 ea. 4 Drawer letter file cabinets (metal)

☐ YES

☒ NO

SQUARE FEET OF SPACE RELEASED AT OFFICE OF ORIGIN

42

(☒ OFFICE ☐ WAREHOUSE)

WAS NON-RECORD MATERIAL REMOVED PRIOR TO SHIPMENT?

☐ YES

☐ NO

WAS AN AUTHORIZED RECORDS DISPOSAL SCHEDULE APPLIED TO THE RECORDS PRIOR TO THE SHIPMENT OF THESE RECORDS?

☒ YES

☐ NO

(Do not write above this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

1-12-53

19

REPORT SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

V.J. Mazzarino

TITLE

Head, Accessioning Section

FEDERAL RECORDS CENTER

GENERAL SECRETARY NATIONAL ARCHIVES AND RECORDS SERVICE		ADMINISTRATION (DLA-VAM) 4-11-89	DO NOT USE THIS BOX SESSION NUMBER 53 A 295 RECORD GROUP NUMBER 137
TRANSMITTAL OF GOVERNMENT RECORDS			
INSTRUCTIONS - Submit original and 3 copies to Federal Records Center in advance of each shipment. Be sure all blanks are filled in.			
FROM (Name of agency) Gen. Services Adm. Federal Supply Service, Inspection Div.		DATE December 29, 1952	
ADDRESS OF AGENCY 250 Hudson Street New York 13, N.Y.			
AGENCY CREATING RECORDS IF DIFFERENT THAN SHIPPING AGENCY (Same)			
NAME OF PERSON RELEASING RECORDS (Type or print) Ann Talbott, Chief, Assignment & Control Br.		SIGNATURE OF PERSON RELEASING RECORDS <i>Ann B. Talbott</i>	
DESCRIPTION OF RECORDS European Aid, Status of SCM contracts, Fibre Reports, Packing Lists & Records, Shipping Instructions, Workload Reports, Inspector Hyman's Reports, Warehouse Contract Files, Packing Lists & Records, Rubber Rotation.			
INCLUSIVE DATE OF RECORDS FROM 1944 TO 1950		<i>25 Cartons</i> 25 Cartons	
RESTRICTIONS ON USE OF RECORDS (If no restrictions write "none") SCM - TO Restricted - others none			
CUBIC FEET OF RECORDS SHIPPED approx. 28 29		TYPE OF CONTAINERS USED Standard (also 1) one wooden case	
METHOD OF SHIPMENT <input type="checkbox"/> BILL OF LADING <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input type="checkbox"/> OTHER _____			
<input type="checkbox"/> RAILROAD (Freight) <input type="checkbox"/> UNITED STATES MAIL <input type="checkbox"/> FIRST CLASS <input type="checkbox"/> RAILWAY EXPRESS <input type="checkbox"/> PARCEL POST <input checked="" type="checkbox"/> GOVERNMENT CONVEYANCE <input type="checkbox"/> REGISTERED MAIL <input type="checkbox"/> RECORDS CENTER VAN <input type="checkbox"/> INSURED MAIL			
STATE NUMBER AND TYPE OF FILING EQUIPMENT WHICH CONTAINED RECORDS approx. 12 ea. 4 Dr. letter file cabinets (metal)		SHOULD THIS EQUIPMENT BE RETURNED? <i>Retained by Agency</i> <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
SQUARE FEET OF SPACE RELEASED AT OFFICE OF ORIGIN 84 SQ FT. (<input checked="" type="checkbox"/> OFFICE <input type="checkbox"/> WAREHOUSE)		WAS NON-RECORD MATERIAL REMOVED PRIOR TO SHIPMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
WAS AN AUTHORIZED RECORDS DISPOSAL SCHEDULE APPLIED TO THE RECORDS PRIOR TO THE SHIPMENT OF THESE RECORDS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
(Do not write above this line)			
THE ABOVE DESCRIBED RECORDS WERE RECEIVED 1-12-53 19			
REPORT SHORTAGES, DAMAGED CONTAINERS, ETC.			
SIGNATURE <i>VJ Mazzarino</i>		TITLE Head, Accessioning Section FEDERAL RECORDS CENTER	

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

534-332

RECORD GROUP NO.

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration Federal Supply Service Inspection Division

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

A. B. Talbott

Ann Talbott

TITLE

Chief, Assign. & Control Br.

DATE

3-31-53

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Inspectors Files of the folders concerning the European Aid Program, with dates ranging from 1947 thru 1953; also transmitted herewith is one carton of Inspectors Files concerning the Strategic & Critical Materials Program (SCM-00P-SCM) Series; also one carton containing various Purchase Orders & Contract # Files, (Inspectors Files) broken down by contract # & by Region.

RECORDS SHELF LIST ATTACHED (GSA Form # 396)

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

SCM-18 Restricted - others none.

7. CUBIC FEET OF RECORDS TRANSFERRED

28 12

8. SQUARE FEET OF SPACE RELEASED

14

OFFICE

STORAGE

9. DOES SHIPMENT CONTAIN NONRECORD MATERIAL?

☒ YES ☐ NO

10. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☐ YES ☐ NO (If "yes," identify schedule)

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

RECORDS SHIPPED IN:

FILING CABINETS

6

TRANSFER CASES

FRC CONTAINERS

XX

Standard Cartons

OTHER (Specify)

TO BE RETURNED:

FILING CABINETS

TRANSFER CASES

OTHER (Specify)

EMPTIED AT AGENCY BY THIS TRANSFER:

2

FILING CABINETS

TRANSFER CASES

SHELVING (Linear feet)

OTHER (Specify)

(Do not write below this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

19

SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

TITLE

FEDERAL RECORDS CENTER

Suzanneka Duffeth
Mgmt Analyst
(DLA-XAM) 4-11-89

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

DO NOT USE THIS BOX

ACCESSION NO.

534337

RECORD GROUP NO.

137

TRANSMITTAL OF GOVERNMENT RECORDS

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

Gen. Services Adm. Federal Supply Service, Inspection Division

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

A.B. Talbott, Chief Assign. & Contr. Br.

TITLE

Chief, Assign. & Control Br.

DATE

3-31-53

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Strategical & Critical Materials Program (SCM-TS) various commodities; 1948 thru present; Strategical & Critical Materials Program (GS-WOP-) various commodities from 1948 thru present; Folders & Control cards on the Mica Program, including Shipping Folders and Code Books for years 1950/1952 w/changes & additions.

RECORDS SHELF LIST ATTACHED (GSA Form # 396)

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

SCM-TS Restricted - others none.

7. CUBIC FEET OF RECORDS TRANSFERRED

20

8. SQUARE FEET OF SPACE RELEASED

23-2/3-21

OFFICE

STORAGE

9. DOES SHIPMENT CONTAIN NONRECORD MATERIAL?

☐ YES

☒ NO

10. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?



YES



NO

(If "yes," identify schedule)

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type)

RECORDS SHIPPED IN:

FILING CABINETS

TRANSFER CASES

FRONT ENDERS

OTHER (Specify)

TO BE RETURNED:

FILING CABINETS

TRANSFER CASES

OTHER (Specify)

EMPTIED AT AGENCY BY THIS TRANSFER:

3 METAL

FILING CABINETS

TRANSFER CASES

SHELVING (Listed last)

OTHER (Specify)

(Do not write below this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

19

SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

TITLE

FEDERAL RECORDS CENTER

Chief Accessioning Sec

FORM OFFICE 10-60400-1

GSA FORM 397
MAY 1962 EDITION

Fredericka Buffett
Mgmt Analyst
(DLA-XAM) 4-11-89

GENERAL SERVICES ADMINISTRATION NATIONAL ARCHIVES AND RECORDS SERVICE		DO NOT USE THIS BOX SESSION NUMBER 53A 120 RECORD GROUP NUMBER 137	
TRANSMITTAL OF GOVERNMENT RECORDS			
INSTRUCTIONS - Submit original and 3 copies to Federal Records Center in advance of each shipment. Be sure all blanks are filled in.			
FROM (Name of agency) General Services Adm., Federal Supply Service, Inspection Div.		DATE October 9, 1952	
ADDRESS OF AGENCY 250 Hudson Street, New York 13, New York			
AGENCY CREATING RECORDS IF DIFFERENT THAN SHIPPING AGENCY (Same)			
NAME OF PERSON RELEASING RECORDS (Type or print) Ann Talbott, Chief, Assignment & Control Br.		SIGNATURE OF PERSON RELEASING RECORDS <i>Ann Talbott</i>	
DESCRIPTION OF RECORDS DA-TPS, UMRA, SCM-TS contract folders, correspondence and index cards; also miscellaneous subject files, warehouses, surplus property and reading.			
INCLUSIVE DATE OF RECORDS	FROM 1944	TO 1950	
RESTRICTIONS ON USE OF RECORDS (If no restrictions write "none") SCM-TS - Restricted - others none			
CUBIC FEET OF RECORDS SHIPPED 61		TYPE OF CONTAINERS USED Standard	
METHOD OF SHIPMENT <input type="checkbox"/> BILL OF LADING <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input type="checkbox"/> NUMBER _____			
<input type="checkbox"/> RAILROAD (Freight) <input type="checkbox"/> RAILWAY EXPRESS <input type="checkbox"/> COMMERCIAL TRUCK <input checked="" type="checkbox"/> GOVERNMENT CONVEYANCE <input type="checkbox"/> RECORDS CENTER VAN		UNITED STATES MAIL <input type="checkbox"/> FIRST CLASS <input type="checkbox"/> PARCEL POST <input type="checkbox"/> REGISTERED MAIL <input type="checkbox"/> INSURED MAIL OTHER _____	
STATE NUMBER AND TYPE OF FILING EQUIPMENT WHICH CONTAINED RECORDS 9 ea. 4 Dr. letter file cabinets (metal)		SHOULD THIS EQUIPMENT BE RETURNED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
SQUARE FEET OF SPACE RELEASED AT OFFICE OF ORIGIN 63		(<input checked="" type="checkbox"/> OFFICE <input type="checkbox"/> WAREHOUSE)	
WAS NON-RECORD MATERIAL REMOVED PRIOR TO SHIPMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
WAS AN AUTHORIZED RECORDS DISPOSAL SCHEDULE APPLIED TO THE RECORDS PRIOR TO THE SHIPMENT OF THESE RECORDS? <input type="checkbox"/> YES <input type="checkbox"/> NO			
(Do not write above this line)			
THE ABOVE DESCRIBED RECORDS WERE RECEIVED 10-27-52		19	
REPORT SHORTAGES, DAMAGED CONTAINERS, ETC.			
SIGNATURE <i>J. A. Reilly</i>		TITLE J. A. Reilly, Acting Chief, Federal Records Center	

GENERAL SERVICE ADMINISTRATION NATIONAL ARCHIVES AND RECORDS SERVICE TRANSMITTAL OF GOVERNMENT RECORDS		DO NOT USE THIS BOX SECTION NUMBER 53A116 RECORD GROUP NUMBER 137															
INSTRUCTIONS - Submit original and 3 copies to Federal Records Center in advance of each shipment. Be sure all blanks are filled in.																	
FROM (Name of agency) General Services Adm., Federal Supply Service, Insp. Division		DATE October 10, 1952.															
ADDRESS OF AGENCY 290 Hudson Street New York 13, N.Y.																	
AGENCY CREATING RECORDS IF DIFFERENT THAN SHIPPING AGENCY 																	
NAME OF PERSON RELEASING RECORDS (Type or print) Ann Talbot, Chief, Assignment & Control Br.		SIGNATURE OF PERSON RELEASING RECORDS <i>Ann Talbot</i>															
DESCRIPTION OF RECORDS DA-TP3, SG-ORF (SCN) & SCN-TS contract folders, Miscellaneous Office Work Records, Foreign Aid Program (EC & ECTS), Travel Vouchers & Authorizations, Miscellaneous Correspondence, Samples, etc.																	
INCLUSIVE DATE OF RECORDS 	FROM 1944	TO 1950															
RESTRICTIONS ON USE OF RECORDS (If no restrictions write "none") SCN-TS - Restricted - others none																	
CUBIC FEET OF RECORDS SHIPPED 52		TYPE OF CONTAINERS USED Standard															
METHOD OF SHIPMENT <input type="checkbox"/> BILL OF LADING <input type="checkbox"/> REGISTERED <input type="checkbox"/> INSURED <input type="checkbox"/> NUMBER _____																	
<table style="width: 100%;"> <tr> <td style="width: 33%;"><input type="checkbox"/> RAILROAD (Freight)</td> <td style="width: 33%;">UNITED STATES MAIL</td> <td style="width: 33%;">OTHER _____</td> </tr> <tr> <td><input type="checkbox"/> RAILWAY EXPRESS</td> <td><input type="checkbox"/> FIRST CLASS</td> <td></td> </tr> <tr> <td><input type="checkbox"/> COMMERCIAL TRUCK</td> <td><input type="checkbox"/> PARCEL POST</td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> GOVERNMENT CONVEYANCE</td> <td><input type="checkbox"/> REGISTERED MAIL</td> <td></td> </tr> <tr> <td><input type="checkbox"/> RECORDS CENTER VAN</td> <td><input type="checkbox"/> INSURED MAIL</td> <td></td> </tr> </table>			<input type="checkbox"/> RAILROAD (Freight)	UNITED STATES MAIL	OTHER _____	<input type="checkbox"/> RAILWAY EXPRESS	<input type="checkbox"/> FIRST CLASS		<input type="checkbox"/> COMMERCIAL TRUCK	<input type="checkbox"/> PARCEL POST		<input checked="" type="checkbox"/> GOVERNMENT CONVEYANCE	<input type="checkbox"/> REGISTERED MAIL		<input type="checkbox"/> RECORDS CENTER VAN	<input type="checkbox"/> INSURED MAIL	
<input type="checkbox"/> RAILROAD (Freight)	UNITED STATES MAIL	OTHER _____															
<input type="checkbox"/> RAILWAY EXPRESS	<input type="checkbox"/> FIRST CLASS																
<input type="checkbox"/> COMMERCIAL TRUCK	<input type="checkbox"/> PARCEL POST																
<input checked="" type="checkbox"/> GOVERNMENT CONVEYANCE	<input type="checkbox"/> REGISTERED MAIL																
<input type="checkbox"/> RECORDS CENTER VAN	<input type="checkbox"/> INSURED MAIL																
STATE NUMBER AND TYPE OF FILING EQUIPMENT WHICH CONTAINED RECORDS 11 ea. 4 Prayer letter file cabinets (metal)		SHOULD THIS EQUIPMENT BE RETURNED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO															
SQUARE FEET OF SPACE RELEASED AT OFFICE OF ORIGIN 77 (<input checked="" type="checkbox"/> OFFICE <input type="checkbox"/> WAREHOUSE)																	
WAS NON-RECORD MATERIAL REMOVED PRIOR TO SHIPMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																	
WAS AN AUTHORIZED RECORDS DISPOSAL SCHEDULE APPLIED TO THE RECORDS PRIOR TO THE SHIPMENT OF THESE RECORDS? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO																	
(Do not write above this line)																	
THE ABOVE DESCRIBED RECORDS WERE RECEIVED 10-10-52 19																	
REPORT SHORTAGES, DAMAGED CONTAINERS, ETC.																	
SIGNATURE <i>Ja Reilly</i>		TITLE Chief															
FEDERAL RECORDS CENTER																	

GENERAL SERVICES ADMINISTRATION
NATIONAL ARCHIVES AND RECORDS SERVICE

DO NOT USE THIS BOX
STOR NUMBER
152-A-30
RECORD GROUP NUMBER
137

TRANSMITTAL OF GOVERNMENT RECORDS

INSTRUCTIONS - Submit original and 3 copies to Federal Records Center in advance of each shipment. Be sure all blanks are filled in.

FROM (Name of agency)

DATE

General Services Administration - Federal Supply Service

October 29, 1951

250 Madison St., New York 17, N. Y.

AGENCY CREATING RECORDS IF DIFFERENT THAN SHIPPING AGENCY

Federal Supply Service

NAME OF PERSON RELEASING RECORDS (Type or print)

SIGNATURE OF PERSON RELEASING RECORDS

S. C. Morgan

S. C. Morgan
Chief, Inspection Division

Commodity Files - Federal Supplies

INCLUSIVE DATE
OF RECORDS

FROM

November 1950

TO

February 1951

RESTRICTIONS ON USE OF RECORDS (If no restrictions write "none")

CUBIC FEET OF RECORDS SHIPPED

TYPE OF CONTAINERS USED

31

FBC Cartons

METHOD OF SHIPMENT

☐ BILL OF LADING

☐ REGISTERED

☐ INSURED

NUMBER

☐ RAILROAD (Freight)

UNITED STATES MAIL

OTHER

☐ RAILWAY EXPRESS

☐ FIRST CLASS

☐ COMMERCIAL TRUCK

☐ PARCEL POST

☒ GOVERNMENT CONVEYANCE

☐ REGISTERED MAIL

☐ RECORDS CENTER VAN

☐ INSURED MAIL

STATE NUMBER AND TYPE OF FILING EQUIPMENT WHICH CONTAINED RECORDS

SHOULD THIS EQUIPMENT BE RETURNED?

7 Filing Cabinets

☐ YES

☒ NO

SQUARE FEET OF SPACE RELEASED AT OFFICE OF ORIGIN

40

(☒ OFFICE

☐ WAREHOUSE)

WAS NON-RECORD MATERIAL REMOVED PRIOR TO SHIPMENT?

☒ YES

☐ NO

WAS AN AUTHORIZED RECORDS DISPOSAL SCHEDULE APPLIED TO THE RECORDS PRIOR TO THE SHIPMENT OF THESE RECORDS?

☐ YES

☐ NO

(Do not write above this line)

THE ABOVE DESCRIBED RECORDS WERE RECEIVED

19

REPORT SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

TITLE

J. B. Kelly per PDS

Acting Director
FEDERAL RECORDS CENTER

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 2-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

59-A-268

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

General Services Administration
INSPECTION DIV., DEFENSE MATERIALS SERVICE
250 Hudson Street, New York 13, N. Y.

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

Ann Talbott

Ann B. Talbott

January 2, 1959

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

This Accession covers Inspection and Testing Records of the Defense Materials Service, consisting of numerical contract files for items purchased for the National Stockpile under the Strategic and Critical Materials, Defense Production Act and Agriculture Act Barter Programs.

Included also are Inspectors' contract records, Stockpile Rubber Storage files, Time and Activity Records, Employee Travel files, Travel Vouchers, Requisitions for Supplies, Cordage Fiber Sales and Rubber Release Routing, Layout and Transfer files.

Date data furnished on SF 134 forms.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All Programs restricted to persons authorized by GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)
☐ NO

PART V, Subsection 5-5

8. CUBIC FEET OF RECORDS TRANSFERRED

30

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

-

10. SQUARE FEET OF SPACE RELEASED

Office

Storage

LOCATION

30

250 Hudson Street, NYC 13 - 13th Floor

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY					
RECORDS SHIPPED IN	5				
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

1-9-59

SIGNATURE

TITLE

FEDERAL RECORDS CENTER ADDRESS

STANDARD FORM 135
APRIL 1963
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

RECORD GROUP NO.

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration
Defense Materials Service, Inspection Div.,
230 Hudson St., New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same.

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

Ann Talbot

Ann Talbot

Records Liaison Officer DMS

Aug 4, 1963

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Commodity and Material Inspection Case Files of Inspection Division, DMS-GSA

DOA P 1848.9 Standards for Inspection and Testing Records Symbols 3-3-2
and 3-3-4.

Misc Inspection and Grading Reports, GSA Form 237 - numerically arranged but
not in continuance sequence - retired in Lots 1 through 30 - exact
listings retained by Inspection Division, DMS, for future reference.
1934/1938

Rubber Sales Releases 1938/1960.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Restricted to persons authorized by DMS-GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)
☐ NO

See above.

8. CUBIC FEET OF RECORDS TRANSFERRED

2

9. CUBIC FEET OF RECORDS DISPOSED
OF IN AGENCY

0

10. SQUARE FEET OF SPACE RELEASED

Office

Storage

2

LOCATION

230 Hudson Street, New York 13, N. Y.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	0				
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

Cart. Cartons

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

, 19

SIGNATURE

TITLE

FEDERAL RECORDS CENTER ADDRESS

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

72A83

RECORD GROUP NO.

291

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

SIGNATURE

Edwin C. Redway

DATE RECORDS RECEIVED

6/14/72

Edwin C. Redway
Chief, Accession Section

TO: Federal Records Center, GSA
641 Washington Street
New York, New York

Frederick
Mgmt. Div. (DFA-XAM)
4-11-89

FROM: (Name and address of Agency transferring records)

General Services Administration
Property Management & Disposal Service
Property Mgmt. Div.-26 Federal Plaza, N.Y. 10007

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

RESTRICTED TO CUSTODIAN OF RECORDS AND DIVISION CHIEF, PROPERTY MGMT. DIVISION

2. SQUARE FEET OF SPACE CLEARED

A. OFFICE

B. STORAGE

3. FILING EQUIPMENT EMPTIED

A. FILE CABINETS (No.)

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

4. CUBIC FEET OF RECORDS
TRANSFERRED

3

5. NAME OF AGENCY CUSTODIAN OF RECORDS

J. SPIEGEL - RECORDS LIAISON OFFICER

6. BUILDING AND ROOM NO. Rm 2832
26 FEDERAL PLAZA, N.Y.

7. TELEPHONE NO.
264-2635

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

MR. T. J. DeGAZIA

T. J. DeGrazia

10. TITLE

CHIEF, PMD

11. DATE

3/21/72

12. BOX NUMBERS

FRC ONLY

AGENCY

13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

5204440

2DM
BOX 1

PIDS PURCHASE ORDERS - 2DM (SERVICE CONTRACT)

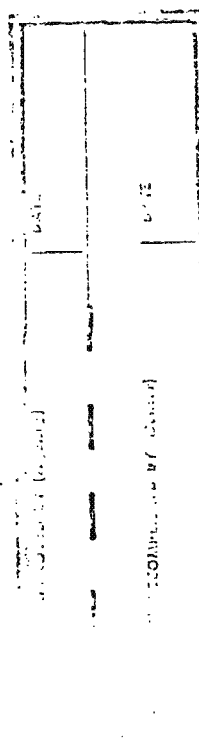
1728
1903
1946
2000 THRU 2003
20007 " 2015
2018 " 2032
2034 " 2103
2016 " 2111
2114 " 2123
2125 " 2155
2158 " 2105
2197 " 2217
2219 " 2236
2238 " 2247

GSA ORDER
OAD-P-1820.2
CHANGE 1
8/18/70
APPENDIX 31-3
PARA- 31-B-25

5204450

2DM
BOX 2

2249 THRU 2254
2257 " 2312
2314 " 2333
2335
2338 THRU 2355
2357 " 2361
2363 " 2384
2387 " 2396
2398 " 2404
2406 " 2422
2424 " 2442
2445 " 2446
2451
2453 THRU 2458



FORM 135		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
		ACCESSION NO. 66 A 713		RECORD GROUP NO. 291	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center. EXCEPTION —Send original and three copies to the Alexandria, Virginia, Center		SIGNATURE <i>Harry M. Silver</i> Harry M. Silver Chief, Accession Section		DATE RECORDS RECEIVED 5/26/66	
FROM: (Name and address of Agency transferring records) General Services Administration Defense Materials Service - Insp.Div. 30 Church Street, New York, N. Y.		TO: Federal Records Center, GSA 641 Washington Street New York, N. Y. <i>Frederick Griffith</i> <i>Mgmt. Support</i> <i>(DLA-XAM) 4-M-89</i>			
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY Restricted to Custodian of Records and Division Chief, DMS Inspection Division					
2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED		4. CUBIC FEET OF RECORDS TRANSFERRED	
A. OFFICE 18	B. STORAGE	A. FILE CABINETS (No.) 3	B. TRANS. FILES (No.)	C. SHELVING (Lin. Ft.) 1	14
5. NAME OF AGENCY CUSTODIAN OF RECORDS D. Schweibert - Records Liaison Officer		6. BUILDING AND ROOM NO. 30 Church Street-11th Fl.		7. TELEPHONE NO. 264-2655	
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
9. AGENCY OFFICIAL (Signature) <i>C. E. Meyer</i>		10. TITLE Chief, Inspection Division		11. DATE 3/18/66	
12. BOX NUMBERS		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)		14. DISPOSAL AUTHORITY (Schedule and Item No.)	
FRC ONLY	AGENCY				
260985C/991C	101/111/114	COMMODITY AND MATERIAL INSPECTION CASE FILES Contracts, Purchase Orders, Expeditors Report, Commodity Inspection Reports, Notice of Inspection, Lab. Analyses & Tests, Correspondence and other Documents pertaining to Inspection of Commodities and materials.		DOA-P-1868.9 Par. 2-App. 15-F Symbol 3-3-1	
260992C 260993C	108 109	STOCKPILE STORAGE INSPECTION CASE FILES Correspondence and documents pertaining to Inspections of stockpile storage, Rotation and replacement Inspections, copies of GSA Form 226 (Notification of Stockpile Inspection).		DOA-P-1868.9 Par. 4-App. 15-F Symbol 3-3-3	
260994C	110	RUBBER RELEASE FILES - INSPECTION CASE FILES Case Files, Amendment or Cancellation Notice, Rubber Release (Rotation) Shipping Instructions, Weight Certificates, Outbound Storage Reports, etc.		DOA-P-1868.9 Par. 5-App. 15-F Symbol 3-3-4	

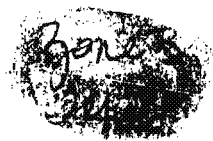
Frederick Griffith
Mont Anal
SCA XAM
4-11-89

ACCESSION # 54-111
 SHOULD READ 54-132

SCM			1 thru 99			SCM			Nos. 1 thru 99		
MASTER CONTRACTS			INSPECTOR FILES			MASTER CONTRACTS			INSPECTOR FILES		
NO.	CART. NO.	ACC. #	NO.	CART. NO.	ACC. #	NO.	CART. NO.	ACC. #	NO.	CART. NO.	ACC. #
01	2F17 30	52A-30	51	NO 247	55A-37	51	2F17 30	52A-30	51	NO 70	53A-295
02	34	53A-116	52	247	"	52	30	"	52	70	"
03	34	"	53		"	53	35	53A-116	53		"
04	34	"	54		"	54	30	52A-30	54	70	53A-295
05			55	247	55A-37	55	35	53A-116	55	70	32/02A-100-5
06	30	52A-30	56		"	56	35	"	56	70	"
07	34	53A-116	57		"	57	35	"	57	99	54A-47
08			58	247	55A-37	58	35	"	58	99	54A-47
09	34	53A-116	59	247	"	59			59	70	53A-295
10	30	52A-30	60	247	"	60	56	53A-294	60	99	54A-47
11			61	247	"	61	30	52A-30	61	70	53A-295
12	30	52A-30	62	247	"	62			62		
13	30	"	63	247	"	63	35	53A-116	63	99	54A-47
14			64	247	"	64			64	175501/2	57A-47
15	34	53A-116	65	247	"	65	35	53A-116	65	99	54A-47
16	34	"	66	247	"	66	35	"	66	99	54A-47
17	34	"	67	247	"	67	35	"	67	99	54A-47
18	34	"	68	247	"	68	30	52A-30	68	70	53A-295
19	34	"	69	247	"	69			69		
20			70	247	"	70	30	52A-30	70	99	54A-47
21	34	53A-116	71	247	"	71	30	"	71	70	53A-295
22			72	247	"	72	98	53A-337	72		
23	34	53A-116	73	247	"	73	98	"	73	99	54A-47
24	34	"	74	247	"	74	35	53A-116	74	70	53A-295
25	34	"	75	247	"	75	98	53A-337	75	99	54A-47
26	34	"	76		"	76	35	53A-116	76	99	54A-47
27	30	52A-30	77		"	77	104	53A-337	77	99	54A-47
28	34	53A-116	78	247	55A-37	78			78		
29	30	52A-30	79	247	"	79	30	52A-30	79		
30	34	53A-116	80	247	"	80	30	"	80		
31	34	"	81	247	"	81	98	53A-337	81	204	54A-111
32			82	247	"	82	98	"	82	204	"
33	30	52A-30	83	247	"	83	35	53A-116	83		
34	34	53A-116	84	247	"	84	98	53A-337	84		
35	30	52A-30	85	247	"	85	35	53A-116	85		
36			86	247	"	86	98	53A-337	86		
37	35	53A-116	87	247	"	87	30	52A-30	87		
38	35	"	88	247	"	88	98	53A-337	88		
39	35	"	89	247	"	89	56	53A-294	89		
40			90		"	90	30	52A-30	90		
41	35	53A-116	91		"	91			91		
42	35	"	92		"	92	98	53A-337	92		
43	35	"	93		"	93	98	"	93		
44	35	"	94		"	94	98	"	94		
45	35	"	95		"	95	98	"	95		
46	35	53A-116	96		"	96	98	"	96		
47			97		"	97	98	"	97		
48	35	53A-116	98		"	98	98	53A-337	98		
49			99		"	99			99		

35 55A-208

SC-000-SCM



CURRENT ASSESSIONS

291-60B-0182 *	1	
291-64A-0230 *	2	
291-65A-0791	1	
291-66A-1093 *	1	
291-70A-0465	4	WITHDRAWN 3/85
291-71A-0769 (FTWORTH MN)	11	
137-74A-0991	12	
137-76A-0267	1	
137-78-0003 *	1	
137-78-0004	1	
137-78A-0022	3	
137-78-0023	1	
137-78-0024	2	
137-78A-0065	4	
291-79-0002	2	
291-79-0003	1	
291-79-0004	3	
291-79-0005	4	
291-79-0006	2	
-291-79-0007	1	
291-80-0002	4	
291-80-0003	5	
291-80-0004	1	
291-80-0005	1	
291-80-0006	1	
291-81-0009	6	
291-81-0010	3	
291-82-0005	1	
291-82-0006	1	
291-82-0007	3	
291-82-0008	14	
291-83-0001	9	

32 ACCESSIONS
107 CU. FT.

* CAN BE DESTROYED



DEFENSE LOGISTICS AGENCY
HEADQUARTERS
CAMERON STATION
ALEXANDRIA, VIRGINIA 22304-6100



MAY 2 3 12 PM '89

IN REPLY
REFER TO

DLA-XAM

CSA-FEDERAL
SUPPLY SERVICE

21 APR 1989

Ms. Mary L. Cunningham
Chief, Information
Collection Management Branch
General Services Administration
Office of Administration
Washington, DC 20405

Dear Ms. Cunningham:

Reference your letter of March 6, 1989, regarding transfer of the National Defense Stockpile (DN) records to the Defense Logistics Agency (DLA).

As requested, enclosure (1) is the signed copies of Standard Forms (SF) 135, Records Transmittal and Receipt which officially transfers custody/accountability of the above referenced records from the General Services Administration to DLA.

The point-of-contact on this matter is Ms. Fredericka Griffith, 274-6234.

Sincerely,

PRESTON B. SPEED
Chief, Administrative
Management Branch

1 Encl

000000 1 100

2010

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF PAGES

1. TO (Complete the address for the records center serving your area as shown in 36 CFR 1228.150.)

Federal Records Center
DoD, Defense Logistics Agency

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
Federal Property Resources Service
National Defense Stockpile
18th & F Streets, NW
Washington, DC 20405

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title)
DATE
3/3/89
GSA Records Officer

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
Mae Simms 535-7938 (CAIR)

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title)
DATE
4/11/89
Frederick B. Smith
Management Analyst (D.A.M.)

Stockton California Depot (DNO-7-S)

Fold Line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTED (g)	DISPOSAL AUTHORITY (Schedule and item number) (h)	DISPOSAL DATE (i)	COMPLETED BY RECORDS CENTER			
AG (a)	FY (b)	NUMBER (c)							LOCATION (j)	SHELF PLAN (k)	CONT. TYPE (l)	AUTO. DISP. (m)
291	88		24.86		Active files transferred to DoD, Defense Logistics Agency, effective July 1, 1988, per Executive Order 12626. (See attached file plan for transferred record series)							

March 6, 1989

Ms. Fredericka Griffith
Records Officer
Defense Logistics Agency - DLA-XAM
Cameron Station, VA 22304-6100

Dear Ms. Griffith:

Reference communication on the transfer of the General Services Administration (GSA), National Defense Stockpile (DN) records to the Department of Defense (DOD), Defense Logistics Agency (DLA-XAM), under Executive Order 12626 dated July 1, 1988, are herewith.

Although records are not being physically moved at this time, the attached GSA Forms 2039, Files Maintenance Plans, are forwarded with completed Standard Forms 135, Records Transmittal and Receipt, for your signature and receipt to officially transfer custody/accountability from GSA to DLA-XAM. For the number of offices and cubic feet of records involved in the transfer, see attached copy of correspondence from DLA to GSA dated February 22, 1989.

Upon review of the documents enclosed, please sign and forward copies of Standard Forms 135 to this office. If you have any questions or problems, please contact Mae Simms, 535-7938.

Sincerely,

/S/
Mary L. Cunningham
Chief,
Information Collection
Management Branch

cc: ~~OF/RE~~
~~Enclosures~~
CAIR

CAIR:MSIMMS:hmj:3/6/89:535-7938



DEFENSE LOGISTICS AGENCY
DIRECTORATE OF STOCKPILE MANAGEMENT
WASHINGTON, DC 20405



DLA-NS

22 FEB 1989

SUBJECT: Records transfer from GSA to DLA

Ms. Mary Cunningham
Chief, Information Collection
Management Branch
General Services Administration
18th & F Streets, NW
Washington, DC 20405

Dear Ms. Cunningham:

As requested by Mae Simms and Maury Grundy, attached are GSA Form 2039, Files Maintenance Plan, and Standard Form 135, Records Transmittal and Receipt, for transfer of records from GSA to DLA. This transfer is in accordance with Executive Order 12626 dated July 1, 1988.

Other information requested is as follows:

1. Number of offices involved in transfer:

Assistant Commissioner	- 1
Divisions	- 5
Zone Offices	- 3
Depots	- 13

2. Cubic feet of files per office:

Records Center

Washington Office	- 2,915
Zone 1	- 1,753
Zone 3	- 107

Files on Hand (includes Active and Historical)

Assistant Commissioner (DN)	3
Stockpile Contracts Division (DNC)	411.75
Quality Assurance Division (DNI)	343
Stockpile Operations Division (DNO)	113
Planning & Market Research (DNP)	150
Systems & Support Division (DNS)	232

Zones (including depots)

1 - New York, NY	1,486
2 - Hammond, IN	3,020
3 - Ft. Worth, TX	145.57

3. DLA records contact:

Ms. Fredericka Griffith
Defense Logistics Agency - DLA-XAM
Cameron Station
Alexandria, VA 22304-6100
Telephone: 274-6234

If you have any questions or comments please contact Cheryl Kates
at 523-3984.

Sincerely,



KENNETH P. DAVIS
Acting Chief, Systems and
Support Division

Encl.
As stated

Delegated Authority

(17) Transfer under the Act of March 4, 1927. Transfers to the Secretary of Agriculture for the purposes of the Act of March 4, 1927, c. 505, 44 Stat. 1442 (20 U.S.C. 191), any land belonging to the United States within or adjacent to the District of Columbia, located along the Anacostia River north of Benning Bridge. (Sec. 1(18) of EO 11609 of July 22, 1971)

(18) Transfer to the Secretary of Housing an Urban Development surplus real property within the area of a local project. Transfers or causes to be transferred to the Secretary of Housing and Urban Development any right, title, or interest held by the Federal Government or any department or agency thereof in any land (including buildings thereon) which is surplus to the needs of the government and which is a local public agency certifies will be within the area of a project being planned by it. (Sec. 1(21) of EO 11609 of July 22, 1971) (42 U.S.C. 1458)

(19) Sales of Government-owned rubber producing facilities under the Rubber Producing Facilities Disposal Act of 1953. Administers the contracts for sale of Government-owned rubber producing facilities made pursuant to the Rubber Producing Facilities Disposal Act of 1953 (67 Stat. 408) and disposes of Government-owned rubber producing facilities under the Act, and administers the national security clause contained in said contracts of sale, including necessary inspections of these facilities. (Act of August 30, 1961 (75 Stat. 418)

(20) Defense Industrial Reserve Act.

(a) Furnishes utilities and other services to occupants or users of defense industrial reserve plants and surplus property installations. (Sec. 210 (a)(10) (40 U.S.C. 490(a)(10)))

(b) Accepts the transfer of and/or uses, maintains, protects, repairs, restores, renovates, leases, and transfers or disposes of industrial plants and related personal property as authorized or directed by the Secretary of Defense (50 U.S.C. 453) and uses proceeds from insurance to repair or restore damaged defense industrial reserve property. (Sec. 210(a)(11) (40 U.S.C. 490(a)(11)))

4. William Langer Jewel Bearing Plant.
Pub. L. 90-469 (82 Stat. 666))

a. Provides for the operation by contract or otherwise, of the William Langer Jewel Bearing Plant;

Limitations

Not delegated to the Associate Administrator for Operations.

Not delegated to the Associate Administrator for Operations.

Not delegated to the Associate Administrator for Operations.

*Old Stockpile
Authorities
transferred
to DOD - 7 Feb 88
SEE EO 12026 attached*

Not delegated to the Associate Administrator for Operations.

Not delegated to the Associate Administrator for Operations.

Presidential Documents

Title 3—

Executive Order 12626 of February 25, 1988

The President

National Defense Stockpile Manager

By the authority vested in me as President by the Constitution and laws of the United States of America, including the Strategic and Critical Materials Stock Piling Act (50 U.S.C. 98 *et seq.*), as amended, section 3203 of the National Defense Authorization Act for Fiscal Year 1988 (Public Law 100-180), and section 301 of Title 3 of the United States Code, it is hereby ordered as follows:

Section 1. The Secretary of Defense is designated National Defense Stockpile Manager. The functions vested in the President by the Strategic and Critical Materials Stock Piling Act, except the functions vested in the President by sections 7, 8, and 13 of the Act, are delegated to the Secretary of Defense. The functions vested in the President by section 8(a) of the Act are delegated to the Secretary of the Interior. The functions vested in the President by section 8(b) of the Act are delegated to the Secretary of Agriculture.

Sec. 2. The functions vested in the President by section 4(h) of the Commodity Credit Corporation Charter Act, as amended (15 U.S.C. 714b(h)), are delegated to the Secretary of Defense.

Sec. 3. The functions vested in the President by section 204(f) of the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. 485(f)), are delegated to the Secretary of Defense.

Sec. 4. In executing the functions delegated to him by this Order, the Secretary of Defense may delegate such functions as he may deem appropriate, subject to his direction. The Secretary shall consult with the heads of affected agencies in performing the functions delegated to him by this Order.

THE WHITE HOUSE,
February 25, 1988.

Ronald Reagan

[FR Doc. 88-4427

Filed 2-26-88; 10:58 am]

Billing code 3195-01-M

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

74-A-991

RECORD GROUP NO.

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

SIGNATURE

DATE RECORDS RECEIVED

TITLE

FROM: (Name and address of Agency transferring records)
GSA-Federal Supply Service
Property Management Division

TO: Federal Records Center, GSA

7NCA

Fredricka Gaffth
Project Analyst
(DLA-XAM) 4/11/83

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY
None

2. SQUARE FEET OF SPACE CLEARED

3. FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

12

B. STORAGE

A. FILE CABINETS (No.)

1-5/7

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

12

5. NAME OF AGENCY CUSTODIAN OF RECORDS

Wanda A. Donaldson

6. BUILDING AND ROOM NO.

FOB - 12D12

7. TELEPHONE NO.

817/334-3447

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES☐ NO

9. AGENCY OFFICIAL (Signature)

10. TITLE

Regional Records Officer

11. DATE

1/31/74

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)14. DISPOSAL AUTHORITY
(Schedule and Item No.)

These files which are to be retired include copies of
contracts, amendments, and specifications; acceptance
and analysis reports; shipping instructions and notices;
and related papers.

31C1

- 1 Wenden Depot Manganese Regulations, coded mailing cards
manganese certificate numbers and correspondence.
Invoices Paid, Notification of shippers, property files,
Certificates of Authorization - 2 files
Physical Inventory Reports (R8-68)
Property Files
Inquiries - 2 files
Bond receipts
Ore delivery estimates
- 2 Assay Reports - 26 Files
- 3 Acceptances - 9 folders
Correspondence - Samples - 1 folder
Sample Reports - 3 folders
- 4 Lot Records - 7 columnar pads
Amenability Tests - 58 reports
Certificates of Ore Valuation and correspondence
Unloading contracts
Assays - Government, composites on all lots
Railcars - Sitton (8M-552)
Truck weights - 6 log books
Weekly Report File
- 5 Ore Settlement Records (J thru S)

*NEW
LOCATION
D1505156
7/6/83
ab*

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

71-A-874

RECORD GROUP NO.

291

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.
EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

B. K. Jennings
B. K. JENNINGS, Chief
Accession & Disposal Branch

DATE RECORDS RECEIVED

10/23/70

FROM: (Name and address of Agency transferring records)

GSA, Property Management Div., PMDS-7DM
819 Taylor St., Rm. 5F18
Fort Worth, TX 76102

TO: Federal Records Center, GSA

P. O. Box 6216
Fort Worth, TX 76115

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

None

2. SQUARE FEET OF SPACE CLEARED

3.

FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

B. STORAGE

A. FILE CABINETS (No.)

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

3

3/7

3

5. NAME OF AGENCY CUSTODIAN OF RECORDS

GSA-PMDS - 7DM

6. BUILDING AND ROOM NO.

FOB, Rm. 5F18

7. TELEPHONE NO.

334-3447

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES ☐ NO

9. AGENCY OFFICIAL (Signature)

Joseph P. O'Connor
Joseph P. O'Connor

10. TITLE

Records Liaison Officer

11. DATE

10-6-70

12. BOX NUMBERS

FRC ONLY

AGENCY

13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

294117

1

GSA/CD Fort Worth Depot
EMERGENCY PROGRAM FILES - FY 1969 & FY 1970

National Fallout Shelter Program Case Files (FY 1969):
Outgoing Shipments -

Not Scheduled

Louisiana - Alexandria, Baton Rouge, Covington, Gretna,
Homer, Lake Charles, Mansfield, Minden, Monroe,
Natchitoches, New Iberia, New Orleans, Oberlin, Opelousas,
St. Martinville, Shreveport

New Mexico - Albuquerque, Cannon AFB, Carlsbad, Ft.
Sumner, Gallup, Las Cruces, Tatum, University Park,
White Sands

Oklahoma - General File, Ada, Altus, Arapaho, Ardmore,
Enid, Claremore, Ft. Sill, Guthrie, McAlester, Norman,
Oklahoma City, Pawhuska, Stillwater, Tulsa

Texas - Abilene, Alpine, Amarillo, Amherst, Angleton,
Aransas Pass, Austin, Bay City, Beaumont, Beeville,
Belton, Bowie, Breckenridge, Brenham, Brownsville,
Brownwood, Bryan, Childress, Cisco, Comanche, Conroe,
Cooper, Cuero, Dallas, Deer Park, Denton, Denver City,
Edinburg, Ellington AFB, El Paso, Farmersville, Fort
Bliss, Fort Hood, Fort Sam Houston, Fort Worth,
Galveston, Gatesville, Georgetown, Goldthwaite, Grand
Prairie, Hamilton, Harlingen, Hereford, Houston,
Irving, Jacksboro, Kaufman, Kelly AFB, Kerrville,
Killeen, Kingsville, Lackland AFB, LaGrange, Lamesa,
Laredo, Lorenzo, Lubbock, Lufkin, McAllen, McKinney,
Meridian, Mineral Wells, New Braunfels, Pasadena, Pecos,

DESTROYED

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO. 71-A-769	RECORD GROUP NO. 291
SIGNATURE <i>B. K. Jennings</i>	DATE RECORDS RECEIVED 9/25/70
TITLE B. K. JENNINGS, Chief Accession & Disposal Branch	

INSTRUCTIONS
Send original and two copies to appropriate
Federal Records Center.
EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

FROM: (Name and address of Agency transferring records)
GSA, Property Management Div., PMDS-7DM
819 Taylor St., Room 5F18
Fort Worth, TX 76102

TO: Federal Records Center, GSA
P. O. Box 6216
Fort Worth, TX 76115

Accession No. 291-71A0769

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

None

2. SQUARE FEET OF SPACE CLEARED		3. Frederick B. Smith (DPA-XAM) 4/11/89 EQUIPMENT EMPLOYED		4. CUBIC FEET OF RECORDS TRANSFERRED
A. OFFICE XXXX 11	B. STORAGE	A. FILE CABINETS (No.) XXXX 1 4/7	B. TRANS. FILES (No.)	C. SHELVE (Lin. Ft.) XXXX 11
5. NAME OF AGENCY CUSTODIAN OF RECORDS GSA-PMDS		6. BUILDING AND ROOM NO. FOB, Room 5F18		7. TELEPHONE NO. 334-3447

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature) <i>Joseph P. O'Connor</i> Joseph P. O'Connor	10. TITLE Records Liaison Officer	11. DATE 9-16-70
--	---	----------------------------

12. BOX NUMBERS FRC ONLY	13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)	14. DISPOSAL AUTHORITY (Schedule and Item No.)
------------------------------------	---	---

274525

1

MANGANESE FILES (DPA) - FORT WORTH, TEXAS:

Type I - Receiving Reports - Contracts GS-OOP-DA-51,
102,147, 166, 286, and 299

Type I - Receiving Reports - Contracts GS-OOP-8-135,
138, 162, and 213

Type I - Receiving Reports - Contracts GS-OOP-9-20,
147, 166, 168, 192, 252, 254, 255, 259, 260,
263, 267, 277, 279, 291, 429, 433, and 592

Type I - Receiving Reports - Contract SCM-TS-10-536

Type II - Receiving Reports - Contract GS-OOP-8-23

Type II - Receiving Reports - Contract GS-OOP-8-23

Type II - Receiving Reports - Contract GS-OOP-8-46

Type II - Receiving Reports - Contract SCM-TS-8-46

Type II - Receiving Reports - Contract SCM-TS-8-46

Type II - Receiving Reports - Contract GS-OOP-8-46

Type II - Receiving Reports - Contract GS-OOP-8-58

Type II - Receiving Reports - Contract GS-OOP-8-67

Type II - Receiving Reports - Contract GS-OOP-8-68

DOA P 1868.9
5-8-11

DOA P 1868.9
5-8-11

Location

Q2102955

9-1-83

1 thru

11

sf

Access No

291-71A0769

STANDARD FORM 135
JULY 1961 EDITION

(Use Standard Form 135A for continuation sheets)

★ U.S. GOVERNMENT PRINTING OFFICE : 1961 O - 613950

135-103

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORD TRANSMITTAL AND RECEIPT

TO: E COMP. D AT FEDERAL RECORDS CENTER

ACCESSION NO.

70-A-465

RECORD GROUP NO.

291

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

B. K. Jennings

DATE RECORDS RECEIVED

8/1/69

TITLE

B. K. Jennings, Chief
Accession & Disposal Branch

FROM: (Name and address of Agency transferring records)

GSA-PMS Baton Rouge Depot - 7DMB
2695 N. Sherwood Forest Drive
Baton Rouge, Louisiana 70814

TO: Federal Records Center, GSA
Fort Worth Federal Center
Fort Worth, Texas

Frederick Griffith 4/11/89
Agent Analyst (DLA-XAM)

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

2. SQUARE FEET OF SPACE CLEARED

A. OFFICE

4
74 sq. ft.

B. STORAGE

3.

FILING EQUIPMENT EMPTIED

A. FILE CABINETS (No.)

4/7

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

4. CUBIC FEET OF RECORDS
TRANSFERRED

4

5. NAME OF AGENCY CUSTODIAN OF RECORDS

General Services Administration, PMS

6. BUILDING AND ROOM NO.

2695 N. Sherwood Forest Dr.

7. TELEPHONE NO.

348-0181 Ext. 279

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES☒ NO

9. AGENCY OFFICIAL (Signature)

Jerrall E. Kirkland

10. TITLE

Depot Manager

11. DATE

6/24/69
May 29, 1969

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES

(Show organizational component creating records)

14. DISPOSAL AUTHORITY

(Schedule and Item No.)

1958 - 1967

Inventory of Strategic & Critical Materials

1959 - 1960

Straight Bills of Lading (Shipment of Cordage Fiber)

Domestic & Unnumbered

1962 - 1963

Uniform Straight Bill of Lading (shipment of S & C

Material) No. 1 - 498

1964 - 1966

U. S. Government Bills of Lading (Receipt of S & C

Material

1958 - 1967

One folder for each last two digits of the GBL

No. 00 - 99

No. 00 - 15

DOA P 1868.9

5-8-11

S&CM Storage Manual,
Sect. III, Para.
3t(1). (Two years
after all like, kind,
or grade has been
shipped out and an
additional 90 days
after notice has been
furnished to GSA that
records are to be
destroyed)

1

2

3

4

One folder for each last two digits of GBL's

No. 16 - 48

1958 - 1967

No. 49 - 75

No. 76 - 99

Car Record Reports -

1959 - 1962

S&CM Storage Manual,
Sect. III, Para.
3t(3). May not be
disposed of)

"

New location
1-5-81
E1900734

WITHDRAWN
3/85
GB

Adapters included in
these GBLs
7/80

STANDARD FORM 135
JULY 1961 EDITION

(Use Standard Form 135A for continuation sheets)

135-104

☆ U.S. GOVERNMENT PRINTING OFFICE: 1965-O-755-153 #77-E

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

RECORD GROUP NO.

70-A-412

291

SIGNATURE

DATE RECORDS RECEIVED

TITLE *B. K. Jennings, Chief*
Accession & Disposal Branch

7/25/69

INSTRUCTIONS
Send original and two copies to appropriate
Federal Records Center.
EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

FROM: (Name and address of Agency transferring records)

GSA/CD Depot - 7DMF, Property Management &
Disposal Service, Warehouse 8, FWFC,
Fort Worth, Texas

TO: Federal Records Center, GSA
P. O. Box 6216
Fort Worth, Texas 76115

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

2. SQUARE FEET OF SPACE CLEARED

3. FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

B. STORAGE

A. FILE CABINETS (No.)

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

2

2/7

2

5. NAME OF AGENCY CUSTODIAN OF RECORDS

Hazel B. Thompson

6. BUILDING AND ROOM NO.

Warehouse 8, FWFC

7. TELEPHONE NO.

5480

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO **Not scheduled**

9. AGENCY OFFICIAL (Signature)

J. A. O'Connor, Records Liaison Officer

10. TITLE

Records Liaison Officer

11. DATE

6/24/69

12. BOX NUMBERS

13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

FRC ONLY

AGENCY

166425

1

FY 68

EMP - Emergency Programs

Herbicide

National Fallout Shelter Program

Fallout Shelter Supplies (Inventory)

Disposition of water drums

Package Ventilation Kits

Contracts (Handling-Service)

Storage Distribution Center, Ft. Worth

OCD, Region 5, Denton, Texas

Registers, Debit & Credit

Shipments by city, Outgoing

(Miscellaneous through El Paso, Texas)

Not scheduled

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DESTROYED
JP

STANDARD FORM 135
JULY 1961 EDITION

(Use Standard Form 135A for continuation sheets)

135-

U.S. GOVERNMENT PRINTING OFFICE: 1961 O-613950

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO. 66-A-1093

RECORD GROUP NO.

291

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

Manfred Dillman

DATE RECORDS RECEIVED

6/13/66

TITLE

For **GEORGE YOUNKIN, Chief**
Accession & Disposal Branch

POST

FROM: (Name and address of Agency transferring records)

GSA-- Defense Materials Service
1114 Commerce Street, Room 1804
Dallas, Texas 75202

TO: Federal Records Center, GSA

P. O. Box 6216
Fort Worth, Texas

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

None

2. SQUARE FEET OF SPACE CLEARED

A. OFFICE

4

B. STORAGE

3.

FILING EQUIPMENT EMPTIED

A. FILE CABINETS (No.)

4/7

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

4. CUBIC FEET OF RECORDS
TRANSFERRED

4

5. NAME OF AGENCY CUSTODIAN OF RECORDS

Grace Montgomery

6. BUILDING AND ROOM NO.

1114 Commerce St., Rm 1804

7. TELEPHONE NO.

RI 9-3372

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

Joseph P. O'Connor

10. TITLE

Records Liaison Officer

11. DATE

5/23/66

12. BOX NUMBERS

FRC ONLY

AGENCY

13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

262574
D1104921
1-13-1351

1

Copies of term contracts as follows: (FY 1964)

GS-07S-9552 (Manpower, Inc., Austin, Texas)
GS-07S-9553 (Manpower, Inc., El Paso, Texas)
GS-07S-9554 (Manpower, Inc., Tulsa, Oklahoma)
GS-07S-9555 (Manpower Industrial, Inc., Houston, Tex.)
GS-07S-9556 (Manpower Services, Western Men, Inc.,
Harahan Depot)
GS-07S-9557 (Western Men, Inc., Fort Worth, Texas)

Reference copies of transportation contracts:

GS-07TT-21 (Virgil L. McKoin) - Hauling of asbestos
GS-07TT-23 thru GS-07TT-35 (various contractors) -
Drayage, moving, packing, etc.
GS-07TT-36 (John Kraak, Inc.) - Handling & movement
of ferromanganese

NIER shipping authorizations:

DMS S/A 4945 - Red River Army Deppt, Texarkana, Tex.
DMS S/A 4976 - St. Louis Procurement District
DMS S/A 5010 - North American Aviation, Tulsa, Okla.
DMS S/A 5015 - Biggs AFB, Texas
DMS S/A 5016 - Bell Helicopter Co., Ft. Worth, Texas
DMS S/A 5081 - New Orleans, Louisiana
DMS S/A 5105 - North American, Tulsa, Oklahoma
DMS S/A 5126 - Tinker AFB, Oklahoma
DMS S/A 5180 - Rocketdyne (NAA, Inc.), McGregor, Tex.
DMS S/A 5188 - "
DMS S/A 5233 - USA Aero Dep. Maint., Corpus Christi
DMS S/A 5253 - Webb AFB, Texas
DMS S/A 5277 - W. Pat Crow, Inc., Ft. Worth, Texas
DMS S/A 5316 - Elec Res Lab, Austin, Texas

DOA P 1868.1

R-6-131X
5-1-2b

5-4-6b

5-8-6a

(CONTINUED)

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

65-A-791

RECORD GROUP NO.

291

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.
EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

DATE RECORDS RECEIVED

3/26/65

TITLE

C. GEORGE YOUNG, Chief
Accession and Disposal Branch

FROM: (Name and address of Agency transferring records)

GSA - Defense Materials Service
1114 Commerce Street, Room 1804
Dallas, Texas 75202

TO: Federal Records Center, GSA
Fort Worth, Texas

P.O. Box 6216

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

None

New Location K2706175 dated 4/1/65

2. SQUARE FEET OF SPACE CLEARED

3.

FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

B. STORAGE

A. FILE CABINETS (No.)

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

5

5/7

5

5. NAME OF AGENCY CUSTODIAN OF RECORDS

Grace Montgomery

6. BUILDING AND ROOM NO.

1114 Commerce St., Rm 1804

7. TELEPHONE NO.

RI 9-3372

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

Thomas L. Renshaw
Thomas L. Renshaw

10. TITLE

Records Liaison Officer

11. DATE

2/24/65

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES

(Show organizational component creating records)

14. DISPOSAL AUTHORITY

(Schedule and Item No.)

DOA P 1868.1

Q290502/ 11-83
285,641

1

Contract files: 1963 and prior

Destroy Box #1 7/1/75

GS-07P-38(Neg.) - Handling & Service - Pryor, Okla.

5-1-2a

GS-07B-4604 - ADT Contract - Harahan, Louisiana

6-1-14

GS-07B-5860 - Lease - Pryor, Okla.

6-1-31d

GS-07P-37(CCC) - Asbestos - Superintendence Co, Inc.

5-8-6a

DMP-134 - Nickel & Cobalt - Cuban American Nickel Co.

BSD-SM-60-46 - Asbestos - The Calabrian Co, Inc.

(Baton Rouge, New Orleans & Gulfport)

GS-07P-32(CCC) - Bauxite - Pittsburgh Testing Lab.

5-8-6b

GS-07P-41(SCM) - Bauxite - Fowco Construction Co.

BSD-SM-62-23 - Bauxite - Reynolds Metals Co.

BSD-SM-62-41 - Antimony - The Calabrian Co., Inc.

285,642

2

Weight tickets:

Destroy Box #2 7/1/70

Contract BSD-SM-60-11 - Bauxite (Lots 4, 6, 7, 8
and one unknown lot)

5-8-6b

Contract BSD-SM-60-91 - Fluorspar (Lots 2001 thru
2040, & Lot 2042)Contract BSD-SM-62-8 - Manganese (Lot numbers
unknown) - "S/S Boston"Contract BSD-SM-62-19 - Manganese (Lot numbers
unknown) - "Reading", "Arlington" & "Malden"

285,643

3

Mexican Mercury Lotting Log

Destroy Box #3 7/1/75

5-8-6a

Manganese Summary Records - El Paso, Texas

5-8-6b

Manganese Records of Delivery - Fort Worth, Texas

STANDARD FORM 135
JULY 1961 EDITION

(Use Standard Form 135A for continuation sheets)

135-108

U.S. GOVERNMENT PRINTING OFFICE: 1961 O - 613950

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
GSA FPMR (41 CFR) 101-11.6

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

64-A-230

RECORD GROUP NO.

269

SIGNATURE

TITLE C. GEORGE MOUNTAIN, Chief
Accessioning & Disposal Branch

DATE RECORDS RECEIVED

9-6-63

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

FROM: (Name and address of Agency transferring records)

General Services Administration - DMS
1114 Commerce Street, Room 1804
Dallas 2, Texas

TO: Federal Records Center, GSA

Fort Worth, Texas

CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY
None

SQUARE FEET OF SPACE CLEARED

3.

FILING EQUIPMENT EMPTIED

OFFICE

0

B. STORAGE

A. FILE CABINETS (No.)

1 1/7

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

4. CUBIC FEET OF RECORDS
TRANSFERRED

0

NAME OF AGENCY CUSTODIAN OF RECORDS

Grace Montgomery

6. BUILDING AND ROOM NO.

1114 Commerce St., Rm 1804 RI 8-5611, Ext. 3372

7. TELEPHONE NO.

MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES☒ NO

AGENCY OFFICIAL (Signature)

Grace Montgomery
Grace Montgomery

10. TITLE

Records & Communications Clk

11. DATE

8/15/63

BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

Files of Defense Materials Service, General Services
Administration (Case Files 1952 - 1963) .

DOA P 1868.1

S&CM PURCHASE CONTRACTS FILES

5-8-6a

BSD-SM-61-71 (Asbestos) - Huxley-Waustfried Corp.
GS-OOP (FR)-1397(SCM) - Sisal - MacLeod & Company.
GS-OOP (FR)-1703(SCM) - Sisal - James Fyfe & Co.
GS-OOP (FR)-1996(SCM) - Abaca - Henry W. Peabody & Co.
GS-OOP (FR)-2021(SCM) - Abaca - Henry W. Peabody & Co.
GS-OOP (FR)-2041(SCM) - Abaca - James Fyfe & Co.
GS-OOP (FR)-2059(SCM) - Abaca - Plymouth Cordage Co.
GS-OOP (FR)-2068(SCM) - Sisal - R. L. Pritchard & Co.
GS-OOP (FR)-2123(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2124(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2125(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2126(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2128(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2129(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2130(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2131(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2132(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2133(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2134(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2152(SCM) - Abaca - James Fyfe & Co.
GS-OOP (FR)-2153(SCM) - Sisal - MacLeod & Company
GS-OOP (FR)-2158(SCM) - Sisal - Plymouth Cordage Co.
GS-OOP (FR)-2159(SCM) - Sisal - Plymouth Cordage Co.
GS-OOP (FR)-2161(SCM) - Sisal - Plymouth Cordage Co.
GS-OOP (FR)-2162(SCM) - Sisal - Plymouth Cordage Co.
GS-OOP (FR)-2170(SCM) - Sisal - R. L. Pritchard & Co.
GS-OOP (FR)-2180(SCM) - Sisal - R. L. Pritchard & Co.
GS-OOP (FR)-2183(SCM) - Sisal - Hanson & Orth, Inc.

STANDARD FORM 135
JULY 1961 EDITION

(Use Standard Form 135A for continuation sheets)

135-103

U.S. GOVERNMENT PRINTING OFFICE: 1961 O - 511950

1476410-747650

CLASSIFIED
CLASS 5

DISPOSAL CARDS PREPARED

New Location K2703521 dated 4-1-88

FORM 135
APRIL 1953
REvised BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.
60-A-182
RECORD GROUP NO.
291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records) Defense Materials Service Room 1804 - 1114 Commerce Street Dallas 2, Texas	2. AGENCY WHICH CREATED RECORDS (If different than transferring agency) Same <i>Frederick Guffeth</i> <i>Mount Analyst (DLA-XAM)</i> 4/1/89	
3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature) <i>[Signature]</i>	TITLE <i>Regional Mount Officer</i>	DATE 9/1/59
4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number) Hugh T. Insell, Acting Chief, Inspection Division, DMS Ext. 2155		

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Box 1 contains SCM Purchase and Service Contracts, DMP Contracts, BSD Contracts.

Box 2 contains Miscellaneous Correspondence on DMP-105, Mexican Mercury Files.

Box 3 contains DMP Contracts, S&CM Cordage Contracts, and S&CM Service contracts.

Box #4 contains Miscellaneous Correspondence Files, Forms 333, 1309, 331, Reports,

Box #5 contains Regional Office Reports, Inspection & Testing Files, and Classified Index of Various Subjects.

DISPOSAL OF THESE FILES IN ACCORDANCE WITH HANDBOOK OF RECORDS RETENTION AND DISPOSAL STANDARDS

Inclusive years for these files 1950 - 1959.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none") None					
7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE? <input checked="" type="checkbox"/> YES (If "yes," identify schedule) Records Retention Handbook <input type="checkbox"/> NO			8. CUBIC FEET OF RECORDS TRANSFERRED 51		9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY
10. SQUARE FEET OF SPACE RELEASED Office 51		Storage		LOCATION Inspection Division, DMS - GSA 1114 Commerce Street, Dallas 2, Texas	
11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):					
		FILING CABINETS		TRANSFER CASES	
		STEEL	WOOD	STEEL	WOOD
EMPTYED AND RETAINED AT AGENCY 5/77		3 1/2 drawers			
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTYED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

12. DESCRIBED RECORDS WERE RECEIVED DAMAGED CONTAINERS, ETC.	October 12, 1959
POSTED	
SIGNATURE <i>[Signature]</i> C. George Younkin	FILE CHIEF, ACCESS. & DISPOSAL BRANCH FEDERAL RECORDS CENTER ADDRESS 424 W. Vickery, Fort Worth 4, Tex

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE
1

OF
13 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration
Bldg. 22 - Military Ocean Terminal
Bayonne, N.J. 07002

As shown in
FPMR 101-11.110-1

2. AGENCY TRANSFER AUTHORIZATION
TRANSFERRING AGENCY OFFICIAL (Signature and title)
T.J. De GRAZIA
Director, Office of Stockpile Mgmt.

DATE
9/11/80

3. AGENCY CONTACT
TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
S. Ruggiero
Regional Records Officer 212-264-8260

4. RECORDS CENTER RECEIPT
RECORDS RECEIVED BY (Signature and title)
Fredericka Buffuth
Mgmt Analyst (DLA-XAM)
DATE
4/11/89

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
26 Federal Plaza Room 19-116
Office of Stockpile Management, FPRS (DMA-2)
New York, New York 10278

Fold line

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRIC- TION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)		(g)	(h)	(i)	(j)	(k)	(l)	(m)
291	81	001	9	1-9	Dept inspection files Office of Stockpile Management, FPRS Program Analyst Files (See attached) 1980	N	OAD P 1820.2 31C52	Oct 1985	131224 The 131232	S	A	✓

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

RECORD GROUP NO.

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

SIGNATURE

DATE RECORDS RECEIVED

TITLE

FROM: (Name and address of Agency transferring records)

GSA Zone 1 QAB/OSM/FPRS
26 Federal Plaza
New York, NY 10278

TO: Federal Records Center, GSA
Bldg 22
Military Ocean Terminal
Bayonne, NJ 07002

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED			4. CUBIC FEET OF RECORDS TRANSFERRED 6.7
A. OFFICE	B. STORAGE 1.8	A. FILE CABINETS (No.) 5	B. TRANS. FILES (No.)	C. SHELVING (Lin. Ft.)	
5. NAME OF AGENCY CUSTODIAN OF RECORDS Sally Benecke			6. BUILDING AND ROOM NO. 26 Federal Plaza		7. TELEPHONE NO. 212-264-8260
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
9. AGENCY OFFICIAL (Signature) Michael J. Pecullan, OSM/FPRS			10. TITLE Chief, QA Branch		11. DATE 2/19/85
12. BOX NUMBERS		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)			14. DISPOSAL AUTHORITY (Schedule and Item No.)
FRC ONLY	AGENCY				

1/7

QUALITY ASSURANCE BRANCH, OFFICE OF STOCKPILE MGMT.
FPRS, ZONE 1

Predisposal Display Sales FY 78 & Mica Sales FY 78
(See attached)

2/7

Mica Display Sales
United Mineral & Chemical Corp.
Paramount Corp.
Leonard J. Buck & Co., Inc.
Associated Commodity Corp.
Cornell Dubilier Elec.
Electronic Mica Co., Inc.
United Mineral & Chemical (UMC)
Mica Resiglass, Inc.
Cornell Dubilier
Associated Commodity Corp.
Paramount Corp.

Mica Sales FY 77

3/7

Mica Sales FY 79
" " FY 80
" " FY 81

OAD P 1820.2
CHGE 1
33C10

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE
1

OF 24
28 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in
FPMR 101-11.410-1

Bldg. 22 - Military Ocean Terminal
Bayonne, N. J. 07002

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

S. HERSHENDV

Acting Chief, Inspection Br. Zone-1

DATE

4/30/80

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

S. RUGGIERO

Regional Records Officer 212-264-8260

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

Frederick Buffuth
Mgmt Analyst (DLA-YAM)

DATE

4/11/81

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
OPM/FPRS Inspection Branch (DMI-2)
26 Federal Plaza, Room 19-116
New York, NY 10007

for Marcello
8260
Sally Bueche

Fold line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
137	80	102	12	1-11/12	Office of Property Management FPRS Inspection Case Files (See attached)	1	OAD P 1820.2 31C1 31C5	JAN. 1985	647557 thru 647568	B	A	N

Standard Form 135 (Rev. 6-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 5 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration
Bldg. 22 - Military Ocean Terminal
Bayonne, N.J. 07002

As shown in
FPMR 101-11.410-1

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

D. HAYWARD
Chief, Inspection Branch

DATE

5/31/78

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

S. Ruggiero
Regional Records Officer 212-264-8260

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

[Signature]
Branch

DATE

6/22/78

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
FSS/PMD Inspection Branch (2FJ1)
26 Federal Plaza Room 19-116
New York, N.Y. 10007

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
137	78	007	3	1-3	Property Management Division Inspection Case Files (See attached) 1975	N	OAD P 1820.2 31C5	Jan. 1983	618030 thru 618032		BA	

When requesting reference service to your records, please furnish the accession number, agency box no. if known, and the date. Send all requests to FPMR, Service Branch, (212-264-8260).

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 11 PAGES

1. TO (Complete the address for the appropriate records center serving your area)
 Federal Archives and Records Center
 General Services Administration
 Bldg. 22 - Military Ocean Terminal
 Bayonne, N.J. 07002

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

2. AGENCY TRANSFER AUTHORIZATION
 TRANSFERRING AGENCY OFFICIAL (Signature and title)
 D. HAYWARD
 Chief, Inspection Branch
 DATE
 4/13/77

General Services Administration
 FSS/PMD Inspection Branch (2FJI)
 26 Federal Plaza, Room 2832
 New York, N.Y. 10007

3. AGENCY CONTACT
 TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)
 S. RUGGIERO
 Regional Records Officer 212-264-8260

4. RECORDS CENTER RECEIPT
 RECORDS RECEIVED BY (Signature and title)
 Fredericka Buffeth
 Mgmt Analyst (DLA-4AM)
 DATE
 4/11/89

RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONL. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
137	77	D10	11	1-11	Property Management Division Inspection Case Files (See attached) 1975		OAD P 1820.2 31C1	JAN Dec. 1982	144008			

RECORDS TRANSMITTAL AND RECEIPT

Complete and send original and two copies of this form to the appropriate Federal Records Center for approval prior to shipment of records. See specific instructions on reverse.

PAGE 1 OF 28 PAGES

1. TO (Complete the address for the appropriate records center serving your area)

Federal Archives and Records Center
General Services Administration

As shown in
FPMR 101-11.410-1

Bldg. 22 - Military Ocean Terminal
Bayonne, N. J. 07002

2. AGENCY
TRANSFER
AUTHOR-
IZATION

TRANSFERRING AGENCY OFFICIAL (Signature and title)

S. IERSHENDV
Acting Chief, Inspection Br. Zone-1

DATE

3. AGENCY
CONTACT

TRANSFERRING AGENCY LIAISON OFFICIAL (Name, office and telephone No.)

S. RUGGIERO
Regional Records Officer 212-264-8260

4. RECORDS
CENTER
RECEIPT

RECORDS RECEIVED BY (Signature and title)

Fredericka Bisjith
Mgmt Analyst (DLA-XAM)

DATE

4/11/89

5. FROM (Enter the name and complete mailing address of the office retiring the records. The signed receipt of this form will be sent to this address)

General Services Administration
OPM/FPRS Inspection Branch (DMI-2)
26 Federal Plaza, Room 19-116
New York, NY 10007

Fold line

6. RECORDS DATA

ACCESSION NUMBER			VOLUME (cu. ft.)	AGENCY BOX NUMBERS	SERIES DESCRIPTION (With inclusive dates of records)	RESTRICTION	DISPOSAL AUTHORITY (Schedule and item number)	DISPOSAL DATE	COMPLETED BY RECORDS CENTER			
RG	FY	NUMBER							LOCATION	SHELF PLAN	CONT. TYPE	AUTO. DISP.
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)
137	80			1-14	Office of Property Management FPRS Inspection Case Files (See attached)		OAD P 1820.2 31C1 & 31C5	JAN. 1985				

7 Oct 89
Years

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

68A53

RECORD GROUP NO.

291

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

Harry M. Silver
Harry M. Silver
Chief, Accession Section

DATE RECORDS RECEIVED

8/30/67

TITLE

Chief, Accession Section

FROM: (Name and address of Agency transferring records)

GENERAL SERVICES ADMINISTRATION
INVENTORY MANAGEMENT DIVISION

PMDS-INSPECTION BRANCH - 2DMI

30 CHURCH STREET, NEW YORK, N.Y. 10007

TO: Federal Records Center, GSA

641 WASHINGTON STREET

NEW YORK, N. Y.

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

Restricted to Custodian of Records and Division Chief, PMDS Inspection Branch

2. SQUARE FEET OF SPACE CLEARED

3.

FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

8

A. OFFICE

B. STORAGE

A. FILE CABINETS (No.)

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

5. NAME OF AGENCY CUSTODIAN OF RECORDS

J. Spiegel-Records Liaison Officer

6. BUILDING AND ROOM NO.

30 Church Street

7. TELEPHONE NO. (GSA ROOM NO.)

264-2617

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES☒ NO

9. AGENCY OFFICIAL (Signature)

Wm. R. Meyers
Wm. R. Meyers

10. TITLE

Chief
Inspection Branch

11. DATE

5/9/67

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

DOA.P-1868.9
SYMBOL 5-5-2b(2)

COMMODITY AND MATERIAL INSPECTION CASE FILES

Contracts, Purchase Orders, Expeditors Reports,
Commodity Inspection Reports, Notice of Inspection,
Lab. Analyses & Tests, Correspondence and other
Documents pertaining to Inspection of Commodities
and materials.

29401C 123
ENMU ENMU
29408C 130

STANDARD FORM 135 JULY 1961 EDITION GENERAL SERVICES ADMIN. REG. 3-IV-302.00		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
		ACCESSION NO. 68A286(2)		RECORD GROUP NO. 291	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center. EXCEPTION —Send original and three copies to the Alexandria, Virginia, Center		SIGNATURE <i>[Signature]</i>		DATE RECORDS RECEIVED SEP 20 1967	
		TITLE <i>[Title]</i>			
FROM: (Name and address of Agency transferring records) GENERAL SERVICES ADMINISTRATION - INVENTORY MANAGEMENT DIVISION PMDS INSPECTION BRANCH, 2DM1 30 CHURCH STREET, NEW YORK, NY 10007		TO: Federal Records Center, GSA 641 WASHINGTON STREET NEW YORK, N. Y. <i>Frederick Buffett</i> <i>Mgmt Analyst</i> <i>(DCA-XAM)</i> 4/11/89			
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY Restricted to Custodian of Records and Division Chief, PMDS Inspection Branch					
2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED		4. CUBIC FEET OF RECORDS TRANSFERRED	
A. OFFICE 18	B. STORAGE	A. FILE CABINETS (No.) 3	B. TRANS. FILES (No.)	C. SHELVING (Lin. Ft.)	17
5. NAME OF AGENCY CUSTODIAN OF RECORDS J. Spiegel-Records Liaison Officer		6. BUILDING AND ROOM NO. 30 Church Street 11th floor		7. TELEPHONE NO. 254-2643	
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
9. AGENCY OFFICIAL (Signature) G. E. Meyers		10. TITLE Chief Inspection Branch		11. DATE 8/15/67	
12. BOX NUMBERS		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)		14. DISPOSAL AUTHORITY (Schedule and Item No.)	
FRC ONLY 85083C 1 <i>thru thru</i> 85099C 17 <i>CHIT</i>		COMMODITY AND MATERIAL INSPECTION CASE FILES Contracts, Purchase Orders, Expeditors Reports, Commodity Inspection Reports, Notice of Inspection, Lab. Analyses & Tests, Correspondence and other documents pertaining to inspection of commodities and materials. Both may be destroyed 68A 286 (2) 4/20/77		DOA.P.1868.9 SYMBOL 3-3-1-2(2)	

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

65A 5639

RECORD GROUP NO.

291

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

[Signature]
TITLE: *Harry H. Silver* PERAMS
Chief, Accession Section

DATE RECORDS RECEIVED

5/24/65

FROM: (Name and address of Agency transferring records)

General Services Administration
Defense Materials Service
30 Church Street, New York, NY 10007

TO: Federal Records Center, GSA

641 Washington Street
New York, N. Y.

[Signature]
4-11-65

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

Restricted to Custodian of Records and Division Chief, DMS Inspection Division

2. SQUARE FEET OF SPACE CLEARED

3. FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS TRANSFERRED

A. OFFICE

2

B. STORAGE

*

A. FILE CABINETS (No.)

*

B. TRANS. FILES (No.)

*

C. SHELVING (Lin. Ft.)

*

2

5. NAME OF AGENCY CUSTODIAN OF RECORDS

Ann Talbott - Records Liaison Officer

6. BUILDING AND ROOM NO.

11th Floor

30 Church Street

7. TELEPHONE NO.

Ext. 520

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES☒ NO

9. AGENCY OFFICIAL (Signature)

[Signature]

J. E. SANTORO

10. TITLE

Acting Chief,
Inspection Division

11. DATE

4/23/65

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

551348 A

81

PURCHASE ORDERS:

Following numbers Prefixed by 2 DMS.

428, 518, 643, 718, 723, 738, 767, 772, 598, 719,
779, 781, 782, 792, 793, 795, 806, 808, 810, 814,
823, 828, 829, 832, 837, 839, 846, 868, 876, 887,
890, 895, 896, 904, 908, 911, 917, 923, 924, 931,
981, 943, 945, 946, 947, 950, 953, 955, 962-1,
962-2/F, 963, 965, 967, 968, 971, 974, 980, 984,
986, 988, 990, 991, 999, 1003, 1004, 1006, 1012,
1014, 1023, 1024, 1025, 1026, 1029, 1031, 1033, 1035,
1036, 1037, 1039, 1040, 1041, 1043, 1062, 1065, 1066,
1070, 1071, 1089, 1099, 1109, 1111, 1117, 1118, 1150

DOA-P-1868,9

Par.2, App. 15-F

Symbol 5-5-1

551349 A

82

PURCHASE ORDERS:

Following numbers Prefixed by 2 DMS.

1169, 1171, 1173, 1194, 1199, 1202, 1203, 1205, 1207,
1210, 1219, 1224, 1258, 1259, 1260, 1265, 1268, ~~1271~~,
1276, 1281, 1288, 1295, 1296, 1300, 1303, 1305, 1308,
1314, 1316, 1325, 1356, 1359, 1367, 1368, 1379, 1380,
1403, 1409, 1410, 1411, 1422, 1434, 1436, 1446, 1450,
1484, 1494, 1500, 1509, 1534, 1566, 1573, 1597, 1598,
1607, 1610, 1620, 1625, 1663, 1701, 1713, 1722, 1724,
1753, 1758, 1774, 1779, 1784, 1795, 1800

DOA-P-1868,9

Par.2, App. 15-F

Symbol 5-5-1

* To Be Consolidated Upon Final Report

**RECORDS TRANSMITTAL
AND RECEIPT**

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

RECORD GROUP NO.

SIGNATURE

DATE RECORDS RECEIVED

INSTRUCTIONS
Send original and two copies to appropriate
Federal Records Center.

FROM: (Name and address of Agency transferring records)
GENERAL SERVICES ADMINISTRATION
PROPERTY MANAGEMENT DIVISION
PMDS INSPECTION BRANCH, 2DMI
26 FEDERAL PLAZA, N. Y., 10007

TO: Federal Records Center, GSA
641 WASHINGTON STREET
NEW YORK, N. Y.

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

Restricted to Custodian of Records and Division Chief, PMDS Inspection Branch

2. SQUARE FEET OF SPACE CLEARED

3. FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

B. STORAGE

A. FILE CABINETS (No.)

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

5. NAME OF AGENCY CUSTODIAN OF RECORDS

6. BUILDING AND ROOM NO.

7. TELEPHONE NO.

J. Spiegel-Records Liaison Officer

26 Federal Plaza 28th fl.

264-2643

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☐ NO

9. AGENCY OFFICIAL (Signature)

Mr. T. J. DeGrazia

T. R. Demsky

Chief, Paperwork Management Branch

Chief Inspection Branch

11. DATE

4-27-70

12. BOX NUMBERS

FRC ONLY

AGENCY

13. **Chief, Paperwork Management Branch**
DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY -
(Schedule and Item No.)

COMMODITY AND MATERIAL INSPECTION CASE FILES

2DMI-1
thru
2DMI-6

**Contracts, Purchase Orders, Expeditors Reports,
Commodity Inspection Reports, Notice of Inspec-
tion, Lab. Analyses & Tests, Correspondence and
other Documents pertaining to Inspection of
Commodities and materials.**

DOA P-1242-9

SYMBOL 5-5-2-1-2

**Retention &
disposal in
accordance with
House Report No. 13
approved 2/28/66**

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO. <i>64A510/1-15</i>	RECORD GROUP NO. <i>291</i>
SIGNATURE <i>Harry M. Luber</i> <i>PER Robert M. Lykes</i>	DATE RECORDS RECEIVED <i>4/26/64</i>
TITLE <i>CHIEF, ACCESSIONING SECTION</i>	

INSTRUCTIONS
Send original and two copies to appropriate
Federal Records Center.
EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

FROM: (Name and address of Agency transferring records)

**General Services Administration
Defense Materials Service-Insp.
30 Church Street, New York, NY**

TO: Federal Records Center, GSA
**641 Washington Street
New York, N. Y.**

Fredrick B. Lykes
Robert M. Lykes
DLA-XAM

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

Restricted to Custodian of Records and Division Chief, DMS Inspection Div.

2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED			4. CUBIC FEET OF RECORDS TRANSFERRED
A. OFFICE * <i>18</i>	B. STORAGE *	A. FILE CABINETS (No.) * <i>3</i>	B. TRANS. FILES (No.) *	C. SHELVING (Lin. Ft.) *	* <i>23</i>
5. NAME OF AGENCY CUSTODIAN OF RECORDS Ann Talbott - Records Liaison Officer			6. BUILDING AND ROOM NO. 18th Fl. 30 Church Street		7. TELEPHONE NO. Ext. 520

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature) <i>A. J. Raggi</i>	10. TITLE Chief, Inspection Div.	11. DATE 4/6/64
--	--	---------------------------

12. BOX NUMBERS FRC ONLY	13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)	14. DISPOSAL AUTHORITY (Schedule and Item No.)
------------------------------------	---	---

145142 B

1

**CORDAGE FIBER PURCHASE CONTRACTS:
Following Numbers Prefixed by GS-OCP-(FR)-**

DOA-P-1868.9

1201	1269	1361	1507	1561	1734
1209	1271	1364	1508	1567	1742
1211	1272	1365	1510	1575	1743
1213	1273	1375	1513	1611	1744
1215	1274	1376	1515	1652	1745
1216	1280	1377	1516	1668	1750
1218	1290	1378	1517	1691	1751
1220	1302	1379	1518	1692	1754
1222	1307	1382	1522	1703	1758
1223	1309	1410	1525	1704	1759
1224	1310	1415	1528	1706	1760
1225	1315	1417	1529	1707	1761
1226	1316	1430	1536	1709	1762
1228	1317	1431	1538	1712	1768
1230	1324	1452	1542	1719	1770
1231	1331	1462	1544	1720	1771
1237	1333	1470	1545	1721	1772
1238	1334	1480	1547	1722	1776
1245	1335	1489	1548	1724	1777
1246	1343	1493	1549	1728	1779
1249	1359	1504	1550	1729	
1257	1360	1505	1560	1731	

* To Be Consolidated Upon Final Report.

STANDARD FORM 135 JULY 1961 EDITION GENERAL SERVICES ADMIN. FPMR (41 CFR) 101-11.4		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
		ACCESSION NO. 75A218		RECORD GROUP NO. 137	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center.		SIGNATURE <i>Frederick Buffeth</i>		DATE RECORDS RECEIVED 4-11-89	
FROM: (Name and address of Agency transferring records) General Services Administration FSS Property Mgmt. Div., Inspection Br. 26 Federal Plaza, New York, N.Y. 10007		TO: Federal Records Center, GSA Bldg 22 - Military Ocean Terminal Bayonne, NJ 07002			
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY Restricted to Custodian of Records and Branch Chief, PMD Inspection Branch and authorized personnel of GSA					
2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED		4. CUBIC FEET OF RECORDS TRANSFERRED	
A. OFFICE 3	B. STORAGE	A. FILE CABINETS (No.) 1	B. TRANS. FILES (No.)	C. SHELVING (Lin. Ft.)	5
5. NAME OF AGENCY CUSTODIAN OF RECORDS Mary O'Neill Records Liason Officer			6. BUILDING AND ROOM NO. Rm. 2832		7. TELEPHONE NO. 264-2643
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
9. AGENCY OFFICIAL (Signature) <i>S. Ruggiero</i>			10. TITLE Regional Records Officer		11. DATE 2/19/75
12. BOX NUMBERS FRC ONLY		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)		14. DISPOSAL AUTHORITY (Schedule and Item No.)	
634810 634814		2-FJI-1 thru 2-FJI-5 thru 5		PROPERTY MANAGEMENT DIVISION, INSPECTION BR FEDERAL SUPPLY SERVICE, GSA REGION 2 Commodity and Material Inspection Case Files Contracts, Expeditors Reports, Commodity Inspection Reports, Service Contracts, Notice of Inspection, Correspondence and other documents pertaining to Inspection of Commodities and Materials.	
				OAD P 1820.2 31C1 Note - Hold until January 1980 and request authorization	

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

73A1732

RECORD GROUP NO.

291 15

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.

EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

Edwin C. Redway

DATE RECORDS RECEIVED

6/20/73

TITLE

Edwin C. Redway
Chief, Accession Section

FROM: (Name and address of Agency transferring records)

General Services Administration
Property Management Division
PMDS Inspection Branch, 2DMI
26 Federal Plaza, N Y 10007

TO: Federal Records Center, GSA
641 Washington Street
New York, N Y.

Frederick Griffith
Montana
(DCA-XAM) 4/11/89

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY
Restricted to Custodian of Records and
Division Chief, PMDS Inspection Branch & Authorized GSA Personnel

2. SQUARE FEET OF SPACE CLEARED

3.

FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

6

B. STORAGE

A. FILE CABINETS (No.)

1

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

7

5. NAME OF AGENCY CUSTODIAN OF RECORDS

J Spiegel Records Liaison Officer

6. BUILDING AND ROOM NO. Rm. 2832
26 Federal Plaza 28th Fl

7. TELEPHONE NO.
264-2653

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

Mr. D Hayward

10. TITLE

Chief, Inspection Branch

11. DATE

5/24/73

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES

(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

211060-55C
thru
211060-51C

2DMI-1
thru
2DMI-11
2DMI-7

COMMODITY AND MATERIAL INSPECTION CASE FILES

Contracts, Expeditors Reports, Commodity Inspection
Reports, Service Contracts, Notice of Inspection,
Lab. Analyses and Tests, Correspondence and other
Documents pertaining to Inspection of Commodities
and materials.

OAD P 1820.2
31C1

note - hold until
Jan 1979 &
request
authorization

Received

INSTRUCTIONS Send original and two copies to appropriate Federal Records Center. EXCEPTION- Send original and three copies to the Alexandria, Virginia, Center		73A 706 SIGNATURE: <i>Edwin C. Redway</i> TITLE: Edwin C. Redway Chief, Accasion Section		RECORD GROUP NO. 291 DATE RECORDED: 10/10/72
FROM: (Name and address of Agency transferring records) General Services Administration Property Management Division, FMDS, Insp. Branch, 2DMI 26 Federal Plaza, N.Y. 10007		TO: Federal Records Center, GSA 611 Washington Street New York, N. Y.		
1. LIFE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY Restricted to Custodian of Records and Division Chief, FMDS Inspection Branch & Authorized GSA Personnel.				
2. SQUARE FEET OF SPACE CLEARED A. OFFICE B. STORAGE		3. FILING EQUIPMENT EMPTIED A. FILE CABINETS (No.) B. TRANS. FILES (No.) C. SHELVING (Lin. Ft.)		
5. NAME OF AGENCY CUSTODIAN OF RECORDS J. Spiegel Records Liaison Officer		6. BUILDING AND ROOM NO. Rm. 2832 26 Federal Plaza 28th Fl.		7. TELEPHONE NO. 264-2653
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? <input type="checkbox"/> YES <input type="checkbox"/> NO				
9. AGENCY OFFICIAL (Signature) D. HAYWARD <i>[Signature]</i>		10. TITLE Chief, Inspection Branch,		11. DATE 8/11/72
12. BOX NUMBERS FRC ONLY AGENCY		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records) FMDS COMMODITY AND MATERIAL INSPECTION CASE FILES Contracts, Inspectors Reports, Commodity Inspection Reports, Service Contracts, Notice of Inspection, Correspondence and other Documents pertaining to Inspection of Commodities and materials.		
3020670 thru 3020700		OAD P 1320.2 3101		

*Printed up
7/1/72*

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMINISTRATION
FPMR (41 CFR) 101-11.4

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

72 A 279

RECORD GROUP NO.

291

SIGNATURE

DATE RECORD RECEIVED

7/9/71

TITLE

T. R. DeGrazia

INSTRUCTIONS
Send original and two copies to appropriate
Federal Records Center.

FROM: (Name and address of Agency transferring records)
GENERAL SERVICES ADMINISTRATION
PROPERTY MANAGEMENT DIVISION
PMDS INSPECTION BRANCH, 2DMI
26 FEDERAL PLAZA, N. Y. 10007

TO: Federal Records Center, GSA
641 WASHINGTON STREET
NEW YORK, N. Y.

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

Restricted to Custodian of Records and Division Chief, PMDS Inspection Branch

2. SQUARE FEET OF SPACE CLEARED

3. FILING EQUIPMENT EMPTIED

4. CUBIC FEET OF RECORDS
TRANSFERRED

A. OFFICE

14

B. STORAGE

A. FILE CABINETS (No.)

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

14

5. NAME OF AGENCY CUSTODIAN OF RECORDS

6. BUILDING AND ROOM NO.

7. TELEPHONE NO.

J. Spiegel Records Liaison Officer

26 Federal Plaza 28th Fl.

264-2653

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

10. TITLE

11. DATE

Mr. T. J. DeGrazia

Chief, Inspection Branch

5/27/71

12. BOX NUMBERS

13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

FRC ONLY

AGENCY

T. R. DeGrazia
Chief, Paperwork Management Branch

COMMODITY AND MATERIAL INSPECTION CASE FILES

2DMI-1
thru
2DMI-14

Contracts, Purchase Orders, Expeditors Reports,
Commodity Inspection Reports, Notice of
Inspection, Lab. Analyses and Tests, Correspondence
and other Documents pertaining to Inspection
of Commodities and materials.

OAD P 1820.2

3125

IF YOU HAVE NEED TO REQUEST
RECORDS OF THIS ACCESSION
PLEASE CALL THE FOLLOWING
NUMBER: (212) 620-5752

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

RECORDS TRANSMITTAL AND RECEIPT

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO. **68A 206** RECORD GROUP NO. **291**

INSTRUCTIONS

Send original and two copies to appropriate Federal Records Center.
EXCEPTION—Send original and three copies to the Alexandria, Virginia, Center

SIGNATURE *Frederick Buffitt* DATE RECORDS RECEIVED **4-11-89**

TITLE *Thomson Aircraft (DLA-XAM)*

FROM: (Name and address of Agency transferring records)
**GENERAL SERVICES ADMINISTRATION
INVENTORY MANAGEMENT DIVISION
FMS INSPECTION BRANCH, 701
30 CHURCH STREET, NEW YORK, NY 10007**

TO: Federal Records Center, GSA
**641 WASHINGTON STREET
NEW YORK, N. Y.**

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY
Restricted to Custodian of Records and Division Chief, FMS Inspection Branch

2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED			4. CUBIC FEET OF RECORDS TRANSFERRED
A. OFFICE 600 12	B. STORAGE	A. FILE CABINETS (No.) 2	B. TRANS. FILES (No.)	C. SHELVING (Lin. Ft.)	10

5. NAME OF AGENCY CUSTODIAN OF RECORDS J. Legal-Records Liaison Officer	6. BUILDING AND ROOM NO. 30 Church Street	7. TELEPHONE NO. 264-2617
---	---	-------------------------------------

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? ☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature) G. B. Myers	10. TITLE Chief Inspection Branch	11. DATE 7-7-67
--	---	---------------------------

12. BOX NUMBERS FRC ONLY	13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)	14. DISPOSAL AUTHORITY (Schedule and Item No.)
------------------------------------	---	---

COMMODITY AND MATERIAL INSPECTION CASE FILES

Contracts, Purchase Orders, Expeditors Reports, Commodity Inspection Reports, Notices of Inspection, Lab. Analyses & Tests, Correspondence and other Documents pertaining to Inspection of Commodities and materials.

**DDA.F.1868.9
SYMBOL 3-3-2b(2)**

Destory

*Received on 7/14/67
Boxes # 131 thru 140
(10 Boxes)*

Joseph Bozef

STANDARD FORM 135
JULY 1961 EDITION
GENERAL SERVICES ADMIN.
REG. 3-IV-302.00

**RECORDS TRANSMITTAL
AND RECEIPT**

TO BE COMPLETED AT FEDERAL RECORDS CENTER

ACCESSION NO.

67A289

RECORD GROUP NO.

291 ~~356~~

INSTRUCTIONS

Send original and two copies to appropriate
Federal Records Center.
EXCEPTION—Send original and three copies to the
Alexandria, Virginia, Center

SIGNATURE

Harry M. Silver

DATE RECORDS RECEIVED

11/23/66

TITLE

Harry M. Silver
Chief, Accession Section

FROM: (Name and address of Agency transferring records)
**GENERAL SERVICES ADMINISTRATION
INVENTORY MANAGEMENT DIVISION
PMDS-INSPECTION BRANCH - 2DMI
30 CHURCH STREET, NEW YORK, NY 10007**

TO: Federal Records Center, GSA
641 WASHINGTON STREET
NEW YORK, N. Y.

1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY

Restricted to Custodian of Records and Division Chief, PMDS Inspection Branch

2. SQUARE FEET OF SPACE CLEARED

A. OFFICE

6

B. STORAGE

A. FILE CABINETS (No.)

1

3. FILING EQUIPMENT EMPTIED

B. TRANS. FILES (No.)

C. SHELVING (Lin. Ft.)

4. CUBIC FEET OF RECORDS
TRANSFERRED

8

5. NAME OF AGENCY CUSTODIAN OF RECORDS

J. Spiegel-Records Liaison Officer

6. BUILDING AND ROOM NO.

30 Church Street

7. TELEPHONE NO.

264-2617

8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE?

☐ YES ☒ NO

9. AGENCY OFFICIAL (Signature)

G. R. Meyers

10. TITLE

**Acting Chief
Inspection Branch**

11. DATE

10/28/66

12. BOX NUMBERS

FRC ONLY

AGENCY

13.

DESCRIPTION OF RECORDS WITH INCLUSIVE DATES
(Show organizational component creating records)

14. DISPOSAL AUTHORITY
(Schedule and Item No.)

**DOA.P-1868.9
PAR.2-APP.15-F
SYMBOL 5-5-2/6/2**

COMMODITY AND MATERIAL INSPECTION CASE FILES

Contracts, Purchase Orders, Expeditors Report,
Commodity Inspection Reports, Notice of Inspection,
Lab. Analyses & Tests, Correspondence and other
Documents pertaining to Inspection of Commodities
and materials.

1960/Jan

~~XXXXXXXXXX~~

DISPOSITION ACCOMPLISHED BY (Center)	DATE
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Retain Boxes 115, 116 + 117

Destroy Boxes 118 THRU 122

STANDARD FORM 135 1961 EDITION GENERAL SERVICES ADMIN. 3-IV-302.00		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER	
		ACCESSION NO. 66A 333(-2)		RECORD GROUP NO. 291	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center. EXCEPTION —Send original and three copies to the Alexandria, Virginia, Center		SIGNATURE <i>[Signature]</i> TITLE Harry M. Silver Chief, Accession Section		DATE RECORDS RECEIVED <i>[Signature]</i> 4-11-88	
FROM: (Name and address of Agency transferring records) General Services Administration Defense Materials Service 30 Church Street, New York, N.Y. 10007		TO: Federal Records Center, GSA 641 Washington Street New York, N.Y. 10014		Mgmt Analyst (DLA-XAM)	
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY Restricted to Custodian of Records and Division Chief, DMS Inspection Division					
2. SQUARE FEET OF SPACE CLEARED A. OFFICE 12 B. STORAGE		3. FILING EQUIPMENT EMPTIED A. FILE CABINETS (No.) 2 B. TRANS. FILES (No.) C. SHELVING (Lin. Ft.)		4. CUBIC FEET OF RECORDS TRANSFERRED 1 BOX	
5. NAME OF AGENCY CUSTODIAN OF RECORDS Ann Talbott - Records Liaison Officer		6. BUILDING AND ROOM NO. 11th Floor 30 Church Street		7. TELEPHONE NO. Ext. 264-2648	
8. MAY THE RECORDS BE DESTROYED, AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO					
9. AGENCY OFFICIAL (Signature) <i>[Signature]</i> U. E. SANTORO		10. TITLE Acting Chief, Inspection Division		11. DATE 7/30/65	
12. BOX NUMBERS FRC ONLY		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)		14. DISPOSAL AUTHORITY (Schedule and Item No.)	
142105D		83		COMMODITY and MATERIAL INSPECTION CASE FILES	
		GS-OOP-1267(SCM) FEATHERS & DOWN Contract & Correspondence Folder #1 & #2 GS-OOP-1432(SCM) FEATHERS & DOWN Contract & Correspondence GS-OOP-1594(SCM) DUCK & GOOSE DOWN Samples & Analyses GS-OOP-2241(SCM) VEGETABLE OILS Contract & Correspondence GS-OOP-2251(SCM) FEATHERS & DOWN Contract & Correspondence Folder #1 - #2 - #3 - #4 - #5 - #6 GS-OOP-2262(SCM) FEATHERS & DOWN Contract & Correspondence Folder #1 - #2 - #3			

STANDARD FORM 135 JULY 1961 EDITION GENERAL SERVICES ADMIN. REG. 3-IV-302.00		RECORDS TRANSMITTAL AND RECEIPT		TO BE COMPLETED AT FEDERAL RECORDS CENTER																			
				ACCESSION NO. 64A-626-1		RECORD GROUP NO. 291																	
INSTRUCTIONS Send original and two copies to appropriate Federal Records Center. EXCEPTION —Send original and three copies to the Alexandria, Virginia, Center				SIGNATURE <i>Harry M. Silver</i>		DATE RECORDS RECEIVED																	
				TITLE Harry M. Silver Chief, Accession Section		<i>Oederich Suffolk Kgmt Analyst (DLA-XAM) 4-11-89</i>																	
FROM: (Name and address of Agency transferring records) General Services Administration Defense Materials Service-Insp. 30 Church Street, New York, N. Y.				TO: Federal Records Center, GSA 641 Washington Street New York, N. Y.																			
1. CITE SECURITY CLASSIFICATION AND/OR RESTRICTION ON USE OF RECORDS, IF ANY Restricted to Custodian of Records and Division Chief, DMS Inspection Div.																							
2. SQUARE FEET OF SPACE CLEARED		3. FILING EQUIPMENT EMPTIED			4. CUBIC FEET OF RECORDS TRANSFERRED																		
A. OFFICE * 38	B. STORAGE *	A. FILE CABINETS (No.) 6	B. TRANS. FILES (No.) *	C. SHELVING (Lin. Ft.) *	* 49																		
5. NAME OF AGENCY CUSTODIAN OF RECORDS Ann Talbott - Records Liaison Officer				6. BUILDING AND ROOM NO. 18th Fl. 30 Church Street		7. TELEPHONE NO. Ext. 520																	
8. MAY THE RECORDS BE DESTROYED AS SCHEDULED WITHOUT FURTHER AGENCY CONCURRENCE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO																							
9. AGENCY OFFICIAL (Signature) <i>R. J. Raggi</i> R. J. RAGGI				10. TITLE Chief, Inspection Div.		11. DATE 5/1/64																	
12. BOX NUMBERS		13. DESCRIPTION OF RECORDS WITH INCLUSIVE DATES (Show organizational component creating records)				14. DISPOSAL AUTHORITY (Schedule and Item No.)																	
FRC ONLY	AGENCY																						
237391 B	24	BSD-SM-56-90 BERYLIUM COPPER Contract Folder <table border="0"> <tr> <td>Folder #1</td> <td>#5</td> <td>#9</td> <td>#13</td> </tr> <tr> <td>#2</td> <td>#6</td> <td>#10</td> <td>#14</td> </tr> <tr> <td>#3</td> <td>#7</td> <td>#11</td> <td></td> </tr> <tr> <td>#4</td> <td>#8</td> <td>#12</td> <td></td> </tr> </table>				Folder #1	#5	#9	#13	#2	#6	#10	#14	#3	#7	#11		#4	#8	#12		DOA-P-1368.9 1963 prior	
Folder #1	#5	#9	#13																				
#2	#6	#10	#14																				
#3	#7	#11																					
#4	#8	#12																					
237392 B	25	BSD-SM-57-43 TITANIUM SPONGE Contract Folder <table border="0"> <tr> <td>Folder #1</td> <td>#4</td> <td>#6A</td> <td>#9</td> </tr> <tr> <td>#2</td> <td>#5</td> <td>#7</td> <td>#10</td> </tr> <tr> <td>#3</td> <td>#6</td> <td>#8</td> <td></td> </tr> </table>				Folder #1	#4	#6A	#9	#2	#5	#7	#10	#3	#6	#8		DOA-P-1868.9 1868.9					
Folder #1	#4	#6A	#9																				
#2	#5	#7	#10																				
#3	#6	#8																					
237393 B	26	BSD-SM-57-42 TITANIUM SPONGE Contract Folder <table border="0"> <tr> <td>Folder #1</td> <td>#4</td> <td>#7</td> <td>#10</td> </tr> <tr> <td>#2</td> <td>#5</td> <td>#8</td> <td>#11</td> </tr> <tr> <td>#3</td> <td>#6</td> <td>#9</td> <td></td> </tr> </table>				Folder #1	#4	#7	#10	#2	#5	#8	#11	#3	#6	#9		DOA-P-1868.9 1868.9					
Folder #1	#4	#7	#10																				
#2	#5	#8	#11																				
#3	#6	#9																					
237394 B	27	BSD-SM-57-48 EXOTHERMIC CHROMIUM METAL Contract Folder Folder #1 - #2 - #3 - #4 - #5 - #6 - #7 *To be Consolidated Upon Final Report.				DOA-P-1868.9																	

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302
135-102

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

61A-632

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

SEA-DMS-INSPECTION DIVISION, MICA UNIT,
HARBORSIDE WAREHOUSE,
31 RICHMOND PLACE, JERSEY CITY, N. J.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Lawrence Commande
LAWRENCE COMMANDER

TITLE

MICA SPECIALIST

DATE

5-26-61

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

ROEMAN HAUGHTON

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

					Retention Period.	
2	17	18	19	20	1956/1958	5 years
17	18	19	20	21	1956/1958	5
19	20	21	22	23	1948/1956	6
21	22	23	24	25	1953/1958	5
22	23	24	25	26	1953/1960	5
25	26	27	28	29	1956/1960	5
29	30	31	32	33	1954/1960	5
30	31	32	33	34	1956/1958	5
31	32	33	34	35	1954/1959	5
33	34	35	36	37	1953/1959	6
34	35	36	37	38	1957/1958	5
35	36	37	38	39	1958/1960	5

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

62A 403

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration
Defense Materials Service, Storage Division
220 Hudson Street, New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

J. T. Nagle

Chief, Storage Division, DMS

January 19, 1962

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

National Stockpile Material Purchase Contracts
1938 Barter Purchasing Inventory
1939 Barter Program

PRC# S-102883

Since Storage Division, DMS contracts cover such varying periods of time, from "spot" delivery to six years, please consider December 31, 1939 as closing date for all contracts included in this Accession.

NOTE: These records are to be stored in Security Area - "CONFIDENTIAL".

Records Retention and Disposal Handbook: DOA P 1868.9
Symbol 3-8-6

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Release only to specifically authorized personnel of DMS-GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?



YES (If "yes," identify schedule)

See above.



NO

8. CUBIC FEET OF RECORDS TRANSFERRED

1

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

2

10. SQUARE FEET OF SPACE RELEASED

Office

Storage

1 sq. ft.

LOCATION

13th Floor, File Section Bay, West Bldg.
220 Hudson Street, New York 13, N. Y.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY					
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

, 19

SIGNATURE

TITLE

FEDERAL RECORDS CENTER ADDRESS

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

62A-551

RECORD GROUP NO.

891

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration
Defense Materials Service, Storage Division
270 Hudson Street, New York 13, New York

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

J. T. Bayko

TITLE

Chief, Storage Division-DMS

DATE

March 26, 1962

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Storage and Distribution Files,
Transportation Documents for
Various Warehouses for the
Years 1952, 1953, 1954, 1955, 1956 and 1957.

Records Retention and Disposal Handbook DOAP 1868.9

Symbol 7-6-1 and

7-6-2

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Release only to specifically authorized personnel of DMS-OSIA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)

☐ NO

5-8-2

See Above

8. CUBIC FEET OF RECORDS TRANSFERRED

2

9. CUBIC FEET OF RECORDS DISPOSED
OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office
2 sq. ft.

Storage

LOCATION

13th Floor, File Section Bay, West Bldg.
270 Hudson Street, New York 13, N.Y.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY					
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

, 19

SIGNATURE

TITLE

FEDERAL RECORDS CENTER ADDRESS

TRANSMITTAL OF GOVERNMENT RECORDS

ACCESSION NO.

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration
Defense Materials Service, Inspection Div.
230 Hudson Street, New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same.

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Ann B. Talbott

TITLE

DATE

Ann B. Talbott

Records Liaison Officer DMS

April 12, 1962

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Commodity and Material Inspection Case Files of Inspection Division, DMS-GSA

DOA P 1868.9 Standards for Inspection and Testing Records Symbol 5-5-2 and 6
(Agency Container No. 2M)-6 contains files under 5-5-4
N/R and A/O Symbols as indicated) - All others " " "

In Commodity and Materials Inspection Case files delivery terms of contracts run from "spot" to one month up to ten years. Inclusive dates are therefore not shown and it is requested that for FRC Standards purposes the completed dates for all be considered December 31, 1961. (5-5-2)

Stockpile Storage Inspection Case Files are arranged alphabetically by name of warehouse. (5-5-4) Rubber Sales Releases, arranged numerically. (5-5-6)

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Restricted to persons authorized by DMS-GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?



YES (If "yes," identify schedule)

See above.



NO

8. CUBIC FEET OF RECORDS TRANSFERRED

26

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office

Storage

LOCATION

37

250 Hudson Street, NYC 13 - 13th Floor, North.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	6				
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

Corr. Cartons.

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

May 10, 1962

SIGNATURE

Harry M. Selzer, Chief

TITLE

FEDERAL RECORDS CENTER ADDRESS

200 Stuyvesant
New York

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX	
ACCESSION NO.	6/A/22
RECORD GROUP NO.	292

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records) GENERAL SERVICES ADMINISTRATION Defense Materials Service, Inspection Division 250 Hudson Street, New York 13, N. Y.		2. AGENCY WHICH CREATED RECORDS (If different than transferring agency) (SAME)	
3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature) <i>Ann Talbott</i> Ann Talbott, RRM Program Representative		TITLE <i>Administrative Assistant</i> Administrative Assistant	DATE <i>August 10, 1960</i> AUGUST 10, 1960
4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)			

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

COMMODITY AND MATERIALS INSPECTION CASE FILES - Records Retention and Disposal Standards PART V, 5-5:

Subsection 2 d. (NO documents removed) CONTAINERS NUMBERED 2MQ-1, 2, 14, 15, 16, 17 and 18
INSPECTORS' FILES

MASTER FILES CONTAINERS NUMBERED 2MQ-3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 19 and 20
2MQ-3 through 13: Subsection 2b
2MQ-19 and 20: As indicated each container or file

Since Inspection Division, Defense Materials Service contracts cover such widely varying periods of time, from "spot" delivery to six years, please consider June 30, 1960 as "closing date" for all contracts included in this accession.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All programs restricted to persons authorized by General Services Administration.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE? <input checked="" type="checkbox"/> YES (If "yes," identify schedule) GRADE PART V AND PART III <input type="checkbox"/> NO		8. CUBIC FEET OF RECORDS TRANSFERRED 20	9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY 1-6-60: 1.5 2-10-60: 6 TOTAL 7.75
---	--	---	--

10. SQUARE FEET OF SPACE RELEASED	LOCATION
Office 30	Storage

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	5				FBC-Cardboard
RECORDS SHIPPED IN					
TO BE RETURNED	None				
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE.

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE <i>Harry L. Helan</i> Harry L. Helan	TITLE <i>Chief</i> Chief	FEDERAL RECORDS CENTER ADDRESS
---	---------------------------------------	--------------------------------

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

61A-267

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

General Services Administration
Inspection Division, IMS
250 Hudson Street, 13th Floor, New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

Ann Talbott Ann Talbott

Records Liaison Officer

October 27, 1960

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Steamer Manifests - Crude Rubber Program - period Jan. 1, 1951/June 30, 1952.

(Folders show names of Steamships on which GSA received rubber from Far East.)

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

RESTRICTED to GSA personnel.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule)

RR&D Standards PART V
Section 5-5, Par 6.

☐ NO

8. CUBIC FEET OF RECORDS TRANSFERRED

6

9. CUBIC FEET OF RECORDS DISPOSED
OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office

Storage

9

approx 2-3/4

LOCATION

13th Floor North, 250 Hudson Street, NYC 13
in custody of TPUS

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

FILING CABINETS

TRANSFER CASES

OTHER
(Specify)

STEEL

WOOD

STEEL

WOOD

EMPTYED AND RETAINED AT AGENCY

RECORDS SHIPPED IN

TO BE RETURNED

CUBIC FEET OF SHELVING EMPTYED AT AGENCY

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

FEDERAL RECORDS CENTER ADDRESS

641 Washington Street
New York 14, New York

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

60A67

RECORD GROUP NO.

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

GENERAL SERVICES ADMINISTRATION
Defense Materials Service, Inspection Div.
250 Hudson Street, New York 13, N. Y.

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

Same

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

Ann Talbott, RRM Program Representative

TITLE

Administrative Assistant

DATE

July 1, 1959

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

George W. Boyle, Chief, Administrative Division, GSA
250 Hudson Street, 2nd Floor
New York 13, N. Y.

AL 5-4300 Ext. 144

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Commodity and Materials Inspection Case Files: (See individual DATE references on SF 134)

Master Files: RR&DS Part V 5-5, 2b

Inspector " " " " , 2d

Master Files: Agency Cartons 2MQ-7, part of -8, -9, -10, -11, -12, -13, -14, -15, -16, -17, -18, -19, and -23.

Inspector Files: " " 2MQ-1, -2, -3, -4, -5, -6, -20, -21 and -22.

Time and Activity Records and Reports: Part V 5-5, par. 5 Carton 2MQ-8

Employee Travel Files: Art III A0, par. 9 " " -8

Commodity and Materials Inspection - Control Record Cards: Part V 5-5, 2b. Carton 2MQ-23.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All programs restricted to persons authorized by General Services Administration.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule) See above and SF 134
☐ NO

8. CUBIC FEET OF RECORDS TRANSFERRED

23

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

10. SQUARE FEET OF SPACE RELEASED

Office
74

Storage

LOCATION

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	4				
RECORDS SHIPPED IN					FRC Cardboard
TO BE RETURNED	None				
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

July 22, 1959

SIGNATURE

Harry M. Silver, Acting Chief, Accession Section

TITLE

FEDERAL RECORDS CENTER ADDRESS

641 Washington Street
New York 14, New York

U. S. GOVERNMENT PRINTING OFFICE 16-68454-1

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

Frederick Buffitt
Mont Angelst
(DLA-XAM) 4-11-89
ACCESSION NO. 58A-243
RECORD GROUP NO. 291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)
GENERAL SERVICES ADMINISTRATION
Inspection Division, Defense Materials Service
250 Hudson Street, New York 13, N.Y.
2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)
LOCATION: Mica Inspection Unit
Harborside Warehouse
Unit 2, Seventh Floor
34, EXCHANGE PLACE
JERSEY CITY, N. J.
3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)
Ann B. Talbott, Chief, AEC Section
4. CUSTODY OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)
Murray S. Hyman, Chief, Inspection Branch
Harborside Warehouse, Jersey City, N.J.
Henderson 2-8500
5. DATE
March 5, 1958

6. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)
This Accession contains MICA INSPECTION CASE FILES under the Strategic and Critical Materials Program.
Applicable Records Retention and Disposal Standards: Part V, Subsection 5-5, Paragraph 2b: "DISPOSAL NOT AUTHORIZED".

8. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")
Restricted to Persons Authorized by GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?
☐ YES (If "yes," identify schedule) Part V, Subsection 5-5
☒ NO
8. CUBIC FEET OF RECORDS TRANSFERRED 5
9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY
10. SQUARE FEET OF SPACE RELEASED
Office 6
Storage
1 cabinet immediately
LOCATION Harborside Warehouse, Unit 2, 7th Floor
Jersey City, N. J.

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):
6
FILING CABINETS
STEEL WOOD
TRANSFER CASES
STEEL WOOD
OTHER (Specify)
EMPTIED AND RETAINED AT AGENCY 1-4dr. cab.
RECORDS SHIPPED IN FNC cartons
TO BE RETURNED
CUBIC FEET OF SHELVING EMPTIED AT AGENCY

DO NOT WRITE BELOW THIS LINE
THE ABOVE-DESCRIBED RECORDS WERE RECEIVED March 19, 1958
SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE J. J. Mazzamuto YMS
TITLE Chief Accessioning Section
FEDERAL RECORDS CENTER ADDRESS

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.

RECORD GROUP NO.

Fredericka Griffith
Mgmt Analyst
(DCA-XAM) 4-11-89

61 A - 571

291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records)

2. AGENCY WHICH CREATED RECORDS (If different than transferring agency)

**General Services Administration
Defense Materials Service-Storage Division
250 Hudson St., New York 13, New York**

(SAME)

3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature)

TITLE

DATE

J. Repko

Chief, Storage Division

May 3, 1961

4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

**Records Retention and Disposal Standards PART V, 5-6-7-8.
Stockpile material Purchase Contracts and Shipping documents
Sales Contracts and Releases
Evacuated Commercial Whee. Contract Files - Rubber transfer
"Request" files, Rec'g. & Outbound Storage Reports, Storage
invoices and controls**

(Detailed on Pages 1 through 23 attached)

90
92 etns.
1 etn.
21 etns.
113
112

Since Storage Division, DMS contracts cover such widely varying periods of time from "spot" delivery to six years, please consider December 31, 1959 as "closing date" for all contracts included in this accession.

Note: These records are to be stored in the security area - **"CONFIDENTIAL"**

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Release only to specifically authorized personnel of DMS-GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE?

☒ YES (If "yes," identify schedule) **See above**
☐ NO

8. CUBIC FEET OF RECORDS TRANSFERRED

113

9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY

69

10. SQUARE FEET OF SPACE RELEASED

Office

Storage

40 sq. ft.

LOCATION

**13th Floor - File Section Bay - West Bldg.
250 Hudson St., N.Y.C.**

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	30				Corr. Cartons
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

, 19

SIGNATURE

TITLE

FEDERAL RECORDS CENTER ADDRESS

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX

ACCESSION NO.	61A-588
RECORD GROUP NO.	291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records) General Services Administration Defense Materials Service, Inspection Div. 250 Hudson Street, New York 13, N. Y.		2. AGENCY WHICH CREATED RECORDS (If different than transferring agency) (Same)	
3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature) Ann B. Talbott <i>Ann B. Talbott</i>		TITLE Records Liaison Officer, DMS	DATE May 4, 1961
4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)			

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

**Files of Inspection Division, Defense Materials Service:
V 3-5, 2b.**

COMMODITY AND MATERIALS INSPECTIONS CASE FILES, arranged numerically under the Strategic & Critical Materials, DMPA and Barter (CCC) Programs, with suffixes and prefixes identifying the several programs. Cartons 2MQ-1/10, 12/19 and 24/25. Delivery terms of material contracts under this category run from "spot" or one month up to ten years. Inclusive dates are therefore not shown and it is requested that for RR&DS purposes the completed date be sondered April 30, 1961.

STOCKPILE STORAGE INSPECTION CASE FILES, arranged by name of depot, alphabetically; others by commodities within a depot. Cartons 2MQ-20, 21 and 23. V 3-5, 4 - with recommendation "Disposal Not Authorized" or longer retention period.

EMPLOYEE TRAVEL FILES, Carton 2MQ-11, DOA P 1868.1 Chap. 3, AO-9.

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

Restricted to persons authorized by DMS-GSA.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE? <input checked="" type="checkbox"/> YES (If "yes," identify schedule) RR&DS PART V 3-5, <input type="checkbox"/> NO DOA P 1868.1 AO-9		8. CUBIC FEET OF RECORDS TRANSFERRED 25	9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY .
--	--	---	--

10. SQUARE FEET OF SPACE RELEASED Office 26		Storage	LOCATION 250 Hudson Street, NYC 13 - 13th Floor, North
---	--	----------------	--

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	6X				Corr. Cartons
RECORDS SHIPPED IN					
TO BE RETURNED					
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

SIGNATURE

Harry M. Silver, Ch.

Accessioning Section

FEDERAL RECORDS CENTER ADDRESS
**250 Hudson Street
New York 14, New York**

Frederick Griffith
Mgmt Analyst
176A-XAM) 4-11-89

STANDARD FORM 135
APRIL 1953
PRESCRIBED BY GENERAL
SERVICES ADMINISTRATION
REG. 3-IV-302

TRANSMITTAL OF GOVERNMENT RECORDS

DO NOT USE THIS BOX	
ACCESSION NO.	66-1-534
RECORD GROUP NO.	291

INSTRUCTIONS.—Submit this form to your area GSA regional office. When submitting to GSA region 3 office, Washington, D. C., submit an original and two copies. When submitting to other GSA regional offices, submit an original and one copy only.

1. FROM (Name and address of agency transferring the records) General Services Administration Defense Materials Service, Inspection Division 250 Hudson Street, New York 13, N. Y.		2. AGENCY WHICH CREATED RECORDS (If different than transferring agency) (same)	
3. AGENCY OFFICIAL AUTHORIZING TRANSFER (Signature) <i>Ann Talbott</i>		TITLE Administrative Assistant	DATE Jan. 29, 1960
4. CUSTODIAN OF RECORDS IN TRANSFERRING AGENCY (Name, address, and telephone number)			

5. DESCRIPTION OF RECORDS (With inclusive dates. Use reverse if additional space is required)

Commodity and Materials Inspection Case Files: SEE INDIVIDUAL DATE REFERENCES ON THE VARIOUS SF 134 pages.

MASTER FILES: BRADS Part V 5-5 2b
INSPECTORS: " " " " " 2d

Inspectors' Files: Agency Cartons 2M-7, through 3 and 5 through 10

Master Files: " " 2M-4 and 5 and 11 through 28

6. RESTRICTIONS ON USE OF RECORDS (If no restrictions, write "none")

All programs restricted to persons authorized by General Services Administration.

7. ARE THESE RECORDS COVERED BY AN AUTHORIZED DISPOSAL SCHEDULE? <input checked="" type="checkbox"/> YES (If "yes," identify schedule) See above and SF 134 <input type="checkbox"/> NO		8. CUBIC FEET OF RECORDS TRANSFERRED 28	9. CUBIC FEET OF RECORDS DISPOSED OF IN AGENCY Awaiting requested authority.
---	--	---	--

10. SQUARE FEET OF SPACE RELEASED Office		Storage	LOCATION 250 Hudson Street, 13th Floor, NYC 13
--	--	----------------	---

11. FILING EQUIPMENT (Enter, where applicable, quantity of each type):

	FILING CABINETS		TRANSFER CASES		OTHER (Specify)
	STEEL	WOOD	STEEL	WOOD	
EMPTIED AND RETAINED AT AGENCY	7				FRC cardboard.
RECORDS SHIPPED IN					
TO BE RETURNED	None				
CUBIC FEET OF SHELVING EMPTIED AT AGENCY					

DO NOT WRITE BELOW THIS LINE

THE ABOVE-DESCRIBED RECORDS WERE RECEIVED
SHORTAGES, DAMAGED CONTAINERS, ETC.

19

NATURE *Harry D. Silver* TITLE *Chief, Records Section* FEDERAL RECORDS CENTER ADDRESS



General Services Administration
Office of Administration
Washington, DC 20405



March 6, 1989

Ms. Fredericka Griffith
Records Officer
Defense Logistics Agency - DLA-XAM
Cameron Station, VA 22304-6100

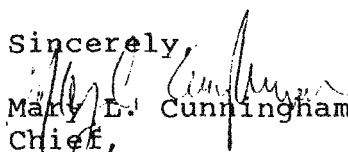
Dear Ms. Griffith:

Reference communication on the transfer of the General Services Administration (GRS), National Defense Stockpile (DN) records to the Department of Defense (DOD), Defense Logistics Agency (DLA-XAM), under Executive Order 12626 dated July 1, 1988, are herewith.

Although records are not being physically moved at this time, the attached GSA Forms 2039, Files Maintenance Plans, are forwarded with completed Standard Forms 135, Records Transmittal and Receipt, for your signature and receipt to officially transfer custody/accountability from GSA to DLA-XAM. For the number of offices and cubic feet of records involved in the transfer, see attached copy of correspondence from DLA to GSA dated February 22, 1989.

Upon review of the documents enclosed, please sign and forward copies of Standard Forms 135 to this office. If you have any questions or problems, please contact Mae Simms, 535-7938.

Sincerely,


Mary L. Cunningham
Chief,
Information Collection
Management Branch

Enclosures



DEFENSE LOGISTICS AGENCY
DIRECTORATE OF STOCKPILE MANAGEMENT
WASHINGTON, DC 20405



DLA-NS

22 FEB 1989

SUBJECT: Records transfer from GSA to DLA

Ms. Mary Cunningham
Chief, Information Collection
Management Branch
General Services Administration
18th & F Streets, NW
Washington, DC 20405

Dear Ms. Cunningham:

As requested by Mae Simms and Maury Grundy, attached are GSA Form 2039, Files Maintenance Plan, and Standard Form 135, Records Transmittal and Receipt, for transfer of records from GSA to DLA. This transfer is in accordance with Executive Order 12626 dated July 1, 1988.

Other information requested is as follows:

1. Number of offices involved in transfer:

Assistant Commissioner	-	1
Divisions	-	5
Zone Offices	-	3
Depots	-	13

2. Cubic feet of files per office:

Records Center

Washington Office	-	2,915
Zone 1	-	1,753
Zone 3	-	107

Files on Hand (includes Active and Historical)

Assistant Commissioner (DN)	3
Stockpile Contracts Division (DNC)	411.75
Quality Assurance Division (DNI)	343
Stockpile Operations Division (DNO)	113
Planning & Market Research (DNP)	150
Systems & Support Division (DNS)	232

Zones (including depots)

1 - New York, NY	1,486
2 - Hammond, IN	3,020
3 - Ft. Worth, TX	145.57

3. DLA records contact:

Ms. Fredericka Griffith
Defense Logistics Agency - DLA-XAM
Cameron Station
Alexandria, VA 22304-6100
Telephone: 274-6234

If you have any questions or comments please contact Cheryl Kates
at 523-3984.

Sincerely,



KENNETH P. DAVIS
Acting Chief, Systems and
Support Division

Encl.
As stated

March 14, 1989

Mr. Kenneth P. Davis
Acting Chief, Systems and
Support Division
Defense Logistics Agency (DLA-NS)
18th & F Streets, NW
Washington, DC 20405

Dear Mr. Davis:

The transfer of the General Services Administration's National Defense Stockpile (DN) records to the Department of Defense, Defense Logistics Agency (DLA), has been completed. I would like to take this opportunity to call to your attention the efforts of Ms. Cheryl Kates, whose hard work and perseverance enabled my staff to complete the transfer successfully and without undue delay. Employees such as she will be missed by GSA.

Sincerely,

15/
Mary L. Cunningham
Chief,
Information Collection
Management Branch

cc: OF/RF - CAIR

CAIR:MGrundy:mrg:3/14/89 (dla.letter)

This appendix gives maintenance and disposition instructions for records created in accounting for, and maintaining a perpetual central inventory of, stockpile materials. These include materials acquired, transferred, donated, or sold as a result of the Strategic and Critical Materials Stockpiling Act, as amended; the Defense Production Act of 1950, as amended; the Agricultural Act of 1954; the Agricultural Act of 1956; the Federal Property Act, as amended; and domestic purchase programs authorized by the Congress.

*Stockpile
Records
Jr. to DSB
3-89*

16H1. Withdrawn by CHGE 16.

~~16H2~~ - 16H4. Reserved.

16H5. Material control accounts (NC1-269-²⁷80-1). Documents reflecting the control accounts for each type of material under each stockpile program except the Defense Production Act (DPA) program. They provide data for manually prepared reports and are used to reconcile general ledger accounts and inventory accounts. Included are cards and related records.

Cut off when material on card is removed from stockpile, hold 5 years, and destroy.

16H6 - 16H9. Reserved.

16H10. Manually prepared stockpile reports (NC1-269-²⁷80-1). Documents created to provide computed stockpile data or analyses and financial data not included in the computer system. Included are analyses of inventories; inventories of Commodity Credit Corporation (CCC) material in custody of GSA; reports of U.S. supplemental stockpile material; inventories of DPA materials; inventories of upgraded strategic and critical materials; and supporting data, but not source data files described elsewhere in this appendix.

Destroy when superseded or obsolete.

16H11 - 16H14. Reserved.

16H15. Stockpile computer reports and listings (NC1-269-²⁷80-1). Machine reports and listings reflecting inventory data developed from current transactions. Descriptions of, and disposition instructions for, these files are as follows:

²⁷
a. Tonnage acquired and disposed of during current month (NC1-269-80-1). This report shows the bulk weight for acquisitions and disposals processed by commodity and program.

Cut off annually, hold 5 year, and destroy.

²⁷
b. Summary report of inventories in storage (NC1-269-80-1). This is a monthly report showing current balances in storage by material, grade, location, program, and class.

- (1) December report, hold for life of the stockpile inventory program and retire. Destroy when 7 years old.
- (2) January through November reports. Cut off annually, hold 3 years, and destroy.

c. Quarterly MIF report (NC1-269-²⁷80-1). The master inventory file report contains the name and code identification for each stockpile item. Each item is listed by material, location, program, class, stockpile number, analytical data, contract number, and lot number.

- (1) Report for quarter ending fiscal year:
Hold 2 years and retire.
Destroy after 3 additional years.
- (2) Report for quarter ending December 31:
Hold 2 years and destroy.
- (3) Report for quarters ending March 31 and
June 30: Hold 6 months
and destroy.

d. Stockpile computer listings (NC1-269-²⁷80-1). Documents reflecting transactions and account balance listings used in verifying and correcting transactions in the inventory accounting system. Included are monthly transaction registers, monthly active record balances, monthly sales commitment balance, available for sales listings, and related records.

Cut off annually, hold 3 years, and destroy.

16H16 - 16H19. Reserved.

16H20. Stockpile survey reports (NC1-269-²⁷80-1). Documents accumulated as a result of surveys of storage locations. Included are survey reports and related records.

Cut off annually after completing the next identical survey or evacuating the storage location, hold 1 year, and destroy.

16H21 - 16H24. Reserved.

16H25. Withdrawn by CHGE 16.

16H26 - 16H29. Reserved.

16H30. Withdrawn by CHGE 16.

16H31 - 16H34. Reserved.

16H35. Transfer files (NC1-269-²⁷80-1). Documents showing the transfer of CCC-owned material to S&CM U.S. Supplemental (USS). Included are copies of contracts, invoices, weight certificates, marine insurance certificates used to verify quantities acquired by CCC and in custody of GSA for transfer to S&CM.

Cut off annually after the transfer of all material of that kind and grade hold 5 years, and destroy.

16H36 - 16H39. Reserved.

16H40. Withdrawn by CHGE 16.

16H41 - 16H44. Reserved.

16H45. Rubber and fiber release files (NC1-269-80-1). Documents showing the release of rubber and fibers from the stockpile. Included are release forms, release amendments, cancellations, and related records.

Cut off annually, hold 2 years, and destroy.

16H46 - 16H49. Reserved.

16H50. Shipping instruction files (NC1-269-80-1). Documents showing the shipment of stockpile materials out of storage locations. They are used in verifying receiving and outbound storage reports. Included are shipping instructions; amendments, cancellations; shipping orders; and related records.

Cut off annually, hold 2 years, and destroy.

16H51 - 16H54. Reserved.

16H55. Batch controls (NC1-269-80-1). Documents used to transmit coded data for keypunching and machine processing and to verify the data recorded on tape. Included are batch controls sheets and batch listings of current transactions.

Place in an inactive file after disposing of material, cut off inactive file annually, hold 3 years, and destroy.

16H56 - 16H59. Reserved.

16H60. Inventory document block ticket files (NC1-269-80-1). Documents showing quantities and dollar values of sales or comparable transactions. They are used to control documents sent to the billing section or other units and to post totals manually entered in the material control accounts. Included are block tickets and related records.

Cut off annually, hold 3 years, and destroy.

16H61 - 16H64. Reserved.

OAD P 1820.2 CHGE

16. 16H65. Receiving report files (NC1-269-~~80~~³⁷-1). Documents showing the receipt of kinds and grades of stockpile materials. They support stockpile transactions entered into the inventory accounting system. Included are receiving reports, reports of discrepancies in shipments, weight certificates, analysis reports, and related records.

Cut off after evacuating the storage location or disposing of material. Hold 2 years and retire.
Destroy when 8 years old.

16H66 - 16H69. Reserved.

17. 16H70. Outbound storage reports files (NC1-269-~~80~~³⁷-1) Reports reflecting outshipments of stockpile materials from storage locations. They are verified with receiving reports to support entries in the inventory accounting system and to permit manual development of inventories at storage locations.

Place in an inactive file after evacuating the storage location or disposing of the commodities.
Cut off inactive file annually, hold 2 years, and retire. Destroy when 8 years old.

16H71 - 16H74. Reserved.

18. 16H75. DPA ledger cards (NC1-269-~~80~~³⁷-1) Documents showing the quantity and value of acquisitions, sales, cost of sales, adjustments, and inventory balances of material by commodity and contract number acquired under the Defense Production Act of 1950, as amended. Included are cards and related records.

Cut off after disposing of material relating to contract, hold 2 years, and retire. Destroy when 7 years old.

FEDERAL PROPERTY RESOURCES SERVICE

D Commissioner

DA Program Support Office

DAA Administrative Management Division

DAAA Administrative Services Branch

DAAC Coordination and Support Branch

DAF Financial Management Division

DAFE Budget Execution and Control Branch

DAFF Budget Formulation Branch

DAP Management Planning and Review Division

DD Deputy Commissioner

DN Office of National Defense Stockpile

DNC Stockpile Contracts Division

DNCM Disposal Branch

DNCS Acquisition Branch

DNI Quality Assurance Division

DNIP Procedures and Operations Branch

DNIT Technical and Commodities Branch

DNO Storage Operations Division

DNOC Commodities and Projects Operations Branch

DNOP Facilities Operations Branch

DNP Planning and Market Research Division

DNS Systems and Support Staff

DN-2 Stockpile Zone Office, Zone 1
(Includes Regions W, 1, 2, and 3)DNI-2 Quality Assurance Branch
Quality Assurance Field Offices:

DNI-2-CB Curtis Bay, MD

DNI-2-NB New Bedford, MA

DNI-2-PP Point Pleasant, WV

DNI-2-SC Scotia, NY

DNI-2-SD Somerville, NJ

DNI-2-SE Seneca, NY

Appendix A

August 6, 1987

DNO-2 Storage Branch
 Storage Depots:
DNO-2-BI Binghamton, NY
DNO-2-CB Curtis Bay, MD
DNO-2-NB New Bedford, MA
DNO-2-PP Point Pleasant, WV
DNO-2-SC Scotia, NY
DNO-2-SD Somerville, NJ

DN-5 Stockpile Zone Office, Zone 2
 (Includes Regions 5 and 6)

DNI-5 Quality Assurance Branch
 Quality Assurance Field Offices:
DNI-5-NH New Haven, IN
DNI-5-WA Warren, OH

DNO-5 Storage Branch
 Storage Depots:
DNO-5-HA Hammond, IN
DNO-5-NH New Haven, IN
DNO-5-SH Sharonville, OH
DNO-5-TO Topeka, KS
DNO-5-WA Warren, OH

DN-7 Stockpile Zone Office, Zone 3
 (Includes Regions 4, 7, 8, 9, and 10)

DNI-7 Quality Assurance Branch
 Quality Assurance Field Offices:
DNI-7-B Baton Rouge, LA
DNI-7-C Clearfield, UT
DNI-7-G Gadsden, AL
DNI-7-S Stockton, CA

DNO-7 Storage Branch
 Storage Depots:
DNO-7-B Baton Rouge, LA
DNO-7-C Clearfield, UT
DNO-7-G Gadsden, AL
DNO-7-S Stockton, CA

DR Office of Real Estate Policy and Sales
DRO Operations Division
DROD Disposal Branch
DRON National Programs Branch

DRP Policy and Planning Division

DRS Surveys and Compliance Division

Appendix A

August 6, 1987

OHR 1804.2B CHGE 6

OFFICE OF GENERAL COUNSEL

L	Office of the General Counsel	
LA	Executive Office	
LG	General Law Division	
LL	Deputy General Counsel	
LP	Personal Property Division	
LR	Real Property Division	

Appendix A

25 and 26

PUBLIC BUILDINGS SERVICE

P Commissioner

PF Office of the Executive Director

PFB Budget Division

PFBO Operations Branch

PFBP Resources Control Branch

PFBR Capital Projects Branch

PFD Deputy Executive Director

PFF Financial Management Division

PFO Operations Division

PG Office of Governmentwide Real Property Policy and Oversight

PGC Customer Outreach Staff

PGD Delegations Division

PGG Governmentwide Policy Division

PK Office of Real Property Information Systems

PKA Systems Policy and Planning Division

PKE Technical Design and Engineering Division

PKK Functional Design Division

PKG Software Development Division

PKO Computer Equipment and Operations Division

PL Office of Facility Planning

PLP Policy Review and Analysis Division

PLE Project Development Division - East

PLW Project Development Division - West

PM Office of Real Property Management and Safety

PMF Facility Management Division

PMFC Concessions Branch

PMFM Buildings Maintenance Branch

PMFS Buildings Services Branch

PML Law Enforcement Division

PMP Program Performance and Analysis Division

PMPO Regional Evaluation Branch

PMPP Performance Analysis Branch

Appendix A

August 6, 1987

PMR Repair and Alteration Division
PMS Safety and Environmental Management Division
PMSE Environmental Management Branch
PMSF Fire Prevention Engineering Branch
PMSO Occupational Safety Branch

PP Office of Procurement
PPB Contract Policy Division
PPC Contract Management Division
PPD Deputy Assistant Commissioner
PPR Rate Case Division
PPU Public Utilities Service Division

PQ Office of Real Property Development
PQD Deputy Assistant Commissioner
PQB Building Technology and Standards Division
PQC Construction Program Division
PQE Operations and Evaluation Division
PQJ International Projects Office
PQP Acquisition Policy Division
PQU Assignment and Utilization Division

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/12/2021 7:42:09 PM
To: Tina Chiappetta - LR [christina.chiappetta@gsa.gov]; Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Katharine Healy - LR [katharine.healy@gsa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals Facility
Attachments: GSA Documents Shipping.pdf; GSA Document Mar 1967.pdf

Hello,

I've attached a few of the documents we have in our file. Let me know if you have any additional questions.

Thanks

From: Tina Chiappetta - LR <christina.chiappetta@gsa.gov>
Sent: Tuesday, February 9, 2021 12:28 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Katharine Healy - LR <katharine.healy@gsa.gov>; Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Re: Fansteel Metals Facility

This Friday looks good for us. I will send an invitation shortly. Thank you.

Tina Chiappetta
Real Property Division
Office of General Counsel
General Services Administration
1800 F Street NW, Room 2019
Washington, DC 20405
Tel.: 202 969 4102
Cell: 202 258 8626

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On Tue, Feb 9, 2021 at 1:23 PM Pletan, Elizabeth <Pletan.Elizabeth@epa.gov> wrote:

Hello Tina,

We would be happy to set up a call with you regarding the information request. So far we have availability all day Friday February 8 until 3:00 PM Central, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12 PM Central. My Thursday and Friday of next week are currently blocked off but should open up in the next couple of days if this Friday, next Tuesday or Wednesday do not work for you and your team.

Thank you,

Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe you have received this communication in error, please delete the copy you received, and do not print, copy, re-transmit, disseminate or otherwise use the information. Thank you.

From: Tina Chiappetta - LR <christina.chiappetta@gsa.gov>

Sent: Tuesday, February 09, 2021 10:57 AM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Katharine Healy - LR <katharine.healy@gsa.gov>; Nixon, Lance <Nixon.Lance@epa.gov>

Subject: Fansteel Metals Facility

Good morning,

We are in receipt of your request under Section 104(e) of CERCLA for information regarding Fansteel Metals Facility in Muskogee, Oklahoma. Would you be available to meet with me and my colleague, Kate Healy, to discuss your request in greater detail? We would like some additional background information to assist us in responding.

If you are available, please suggest a couple of days/times that work for you and I will set up a meeting.

Thank you.

Tina Chiappetta

Real Property Division
Office of General Counsel
General Services Administration

1800 F Street NW, Room 2019

Washington, DC 20405

Tel.: 202 969 4102

Cell: 202 258 8626

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SHIPPING NOTICE

Metals Group
FANSTEEL
METALLURGICAL CORPORATION



NUMBER ONE TANTALUM PLACE
NORTH CHICAGO, ILLINOIS • 60064

DB

SALESMAN LIADIS/LIADIS	SALES TERR. 3-1-0432	CUST. CODE 996-49	ST.	TAX	DATE REC'D. 02-22-68	CUST. ORDER NO. AND DATE GS-00P 02-21-68	INVOICE	PART-P CORP C P	DATE SHIPPED 5/23/68	ORDER NO. 090314
SOLD TO GENERAL SERVICES ADMINISTRATION OFFICE OF REGIONAL DATA AND FINANCIAL MANAGEMENT ACCOUNTS PAYABLE BRANCH 7TH AND -D- STREETS WASHINGTON, D.C. 20407								SHIP TO 23252/SCM/, ITEM 6 OF 7 ITEMS		
								SHIPPED WITH ORDER NO.		

SAME
C/O GSA-PHDS GADSDEN DEPOT
GADSDEN, ALABAMA 35901

REQUESTED ROUTING BEST WAY PREPAY AND ADD				CODE	F.O.B. MUSKOGEE	TERMS NET 30 DAYS	D.O. RATING AND CONTRACT NO. Z0			
DESCRIPTION		Item	ACCT.	PROD. CODE	QUAN. PRIOR TO THIS SHIPMENT	QUANTITY SHIPPED	Unit *	UNIT PRICE	TRADE DISC.	NET AMOUNT
FANSTEEL PART NO. 9 7 5 3	CUSTOMER PART NO.				5 3	5 3		6 4 2		6 4 2
CONVERSION OF GOVERNMENT FURNISHED TANTALUM AND COLUMBIUM BEARING MATERIAL /TIN SLAG/ TO COLUMBIUM METAL POWDER		6		898	6108.000 /2770.589 K/	1903.000 /863.200 K/	P	10.02		\$19068.06
LOT #16 484 LBS										
LOT #17 469 LBS										
LOT #18 474 LBS										
LOT #19 476 LBS										
NO. PACKAGES 4 DRUMS		WEIGHT 2015 LBS		TRANS./ INSURANCE		INVOICE NO.		SHIPPED VIA JONES TRUCK LINES B/L 93181 - PREPAID		

*UNIT: K - KG. S - SQ. IN. E - EACH I - INCH R - METER
P - LB. A - SQ. FT. M - THOUSAND F - FEET X - THOUSAND METERS
T - TROY OZ. L - LOT Y - THOUSAND FT.

XXX
PARTIAL SHIPMENT
COMPLETE SHIPMENT

PACKING SLIP
145541



SHIPPING INSTRUCTIONS TO
202-343

Ed. 2029 E. Thompson
Ed. 4049 No. Storage

GENERAL SERVICES ADMINISTRATION
TRANSPORTATION AND COMMUNICATIONS SERVICE
General Services Building
Washington, D. C. 20405
SHIPPING INSTRUCTIONS
UPGRADING OF MATERIAL

5/23/68
2. CONTRACT NUMBER
GS-COF-23252(SCM)-38
(RETURN FROM UPGRADING)

3. TO
✓ Fansteel Metallurgical Corporation
Route 5, Box 238
Muskogee, Oklahoma 74401

4. DATE DUE: NOW
5. CUSTOMS FORMALITIES WILL BE
ATTENDED TO BY

7. POINT OF ORIGIN
Muskogee, Oklahoma

8. A. YOU ARE AUTHORIZED TO SHIP THE MATERIAL DESCRIBED BELOW WHEN NOTIFICATION IS RECEIVED FROM THE INSPECTION DIVISION OF THE
ADMINISTRATION ADVISING THAT THE MATERIAL HAS BEEN RELEASED.

B. SHIPPING MARKS AS SHOWN IN THE CONTRACT INCLUDING ABOVE CONTRACT NUMBERS MUST APPEAR ON ALL DOCUMENTS AND INVOICES.

9. ORIGIN TO: GENERAL SERVICES ADMINISTRATION - FMDS

DEFENSE CONTRACTING AGENCY
c/o GSA-FMDS Gadsden Depot
Gadsden, Alabama 35901

DELIVERY TERMS: FOB Muskogee, Oklahoma, Freight Prepaid

10. CARRIER
Jones Truck Lines, Inc. & Conn.

RATE: 290¢ CWT

13. RATE OF SHIPMENT AND MAXIMUM
DAILY HANDLING CAPACITY AT
DESTINATION MONDAY THROUGH
FRIDAY EXCLUSIVE OF HOLIDAYS

11. TYPE OF EQUIPMENT REQUIRED

Closed truck, clean and sound

AUTP: SMCRC-505C

TRUCK DELIVERY HOURS
MONDAY THROUGH FRIDAY
A.M. P.M.

12. EACH SHIPMENT TO BE LOADED IN ACCORDANCE WITH CARRIER'S RULES AND REGULATIONS INCLUDING
OBSERVANCE OF APPLICABLE MINIMUM WEIGHT OF 2000 lbs.

14. DESCRIPTION OF MATERIAL (including total units and weights)

COLUMBIUM METAL POWDER, IN 4 DRUMS WEIGHING 1,906 LBS. NET AND 2,026 LBS. GROSS

LOT NO.	NO. DRUMS	NET WT.	GROSS WT.
16	1	484	514
17	1	474	504
18	1	474	504
19	1	474	504

15. ADDITIONAL INSTRUCTIONS:

- a. Prepare commercial bill of lading in accordance with these shipping instructions and Contract Article III-C6. Indicate description as POWDER METALS, RVNIX 40¢ per lb. Also indicate thereon the same notations contained in previous instructions covering converted material on this contract.
- b. Material shall be weighed as per contract Article IVC in the presence of a GSA Inspector.

REMARKS: DOCUMENT INSTRUCTIONS - GSA FORM 429
GOVERNMENT USE ONLY

NOTE #1: UPON RECEIPT OF MATERIAL, SUBMIT RECEIVING REPORTS, GSA FORM 131 IN QUADRUPLES TO:

GENERAL SERVICES ADMINISTRATION
OFFICE OF REGIONAL DATA AND FINANCIAL MANAGEMENT
RECEIVING AND REPORTS DIVISION
GENERAL SERVICES REGIONAL OFFICE BUILDING
WASHINGTON, D.C. 20407

APPROVED

FOR John S. Peters, Director
Traffic Services Division, TTS

COPIES HAVE BEEN DISTRIBUTED AS LISTED BELOW

3	CONSIGNEE - SEE NOTE #1	COMMERCIAL BILL OF LADING - DMO SPAC 4	COMMERCIAL BILL OF LADING - Fansteel Metallurgical Corp
		COMMERCIAL BILL OF LADING - DRI	
		COMMERCIAL BILL OF LADING - DNY	
		OFFICIAL FILE - TTS	No. 1 Tantalum Place North Chicago, Ill. 60064
1	INSPECTION - DALLAS - Dallas	READING FILE - TTS (Dom. SCM)	
2	INSPECTION - ATLANTA - Atlanta	2	DRUM - 3324P (D.C.)
2	REG. DIR. - TD, TT	TTS	

**GENERAL SERVICES ADMINISTRATION
TRANSPORTATION AND COMMUNICATIONS SERVICE**

DATE

5-23-68

DOCUMENT PREPARATION AND DISTRIBUTION INSTRUCTIONS

CONTRACT NUMBER

GS-OOP-23252 (SCM)-38

1. GENERAL INSTRUCTIONS

(RETURN FROM UPGRADING)

- Unless specifically authorized by the issuing office, Government Bills of Lading must be used *ONLY* in connection with the applicable shipping instructions.
- Government Bills of Lading may be amended only with the concurrence of the issuing office and when so authorized, such authority and date shall be cited on the Bill of Lading and all copies thereof.
- All unused, spoiled or mutilated Government Bills of Lading must be returned to issuing office for cancellation, with appropriate explanation.
- When routing is by truck, railway express or airfreight, enclose consignee's documents in envelope addressed to consignee and dispatch via the carrier.

2. PREPARATION OF GOVERNMENT BILLS OF LADING

The following information, when applicable, should be inserted on the Bills of Lading and all copies:

CAR INITIALS AND NUMBERS
CAR AND/OR TRUCK SEAL NUMBERS
TRUCK AND LICENSE NUMBERS (INCLUDING STATE)
SIZE OF CAR ORDERED AND FURNISHED, AND DATE FURNISHED
MARKS
NUMBER AND KIND OF PACKAGES
ON LESS-CARLOAD OR LESS-TRUCKLOAD SHIPMENTS, SHOW
WHETHER OR NOT PICK-UP SERVICE PERFORMED BY CARRIER
* (When shipment consists of dissimilar items, show actual gross weight of each package or piece or total gross weight of each group of similar packages or pieces.)

WEIGHT, VIZ:*

- CARRIER'S WEIGHT AGREEMENT
 - CERTIFIED PUBLIC WEIGHER OR GAUGER
 - CERTIFIED FOREIGN WEIGHT
 - CARRIER'S SCALE WEIGHT
- WEIGHT OF DUNNAGE OR BRACING (If used to protect the material)

3. DOCUMENT DISTRIBUTION

DISPATCH TO ADDRESSES INDICATED BELOW	GOVERNMENT BILLS OF LADING (After execution by Carrier, who will retain Shipping Order, and the Freight Way- bill in original and one copy)		WEIGHT CERTIFICATES (Certificate to indi- cate grade as spec- ified in contract. Each copy to be manually signed.)	INVOICES CERTIFIED		COMMERCIAL BILLS OF LADING (To be prepared in same manner as Government Bills of Lading)	
	ORIGINAL	COPY		ORIGINAL	COPY	ORIGINAL	COPY
TO CONSIGNEE	1	1	1-BY MAIL 1- TO TRAVEL WITH SHIPMENT	NONE	NONE	1	1
TO CARRIER AT ORIGIN	NONE	3 (Shipping Order, Freight Waybill, original and copy)	1 (To be attached to Shipping Order)	NONE	NONE	NONE	1 SHIPPING ORDER
TO GENERAL SERVICES ADMINISTRATION TRANSPORTATION AND COMMUNICATIONS SERVICE CONTRACT ADMINISTRATION DIVISION SHIPPING AND CLAIMS BRANCH GENERAL SERVICES BUILDING WASHINGTON 25 D.C. 20405	NONE	3	1	NONE	NONE	NONE	1
TO GENERAL SERVICES ADMINISTRATION DEFENSE MATERIALS SERVICE INSPECTION DIVISION GENERAL SERVICES BUILDING WASHINGTON 25 D.C. 20405	NONE	NONE	1	NONE	NONE	NONE	NONE
TO SHIPPER, FORWARDER OR WAREHOUSE	NONE	1	1	NONE	NONE	NONE	1
TO GENERAL SERVICES ADMINISTRATION, REGION 3 OFFICE OF REGIONAL FINANCE AND ADM. ACCOUNTING AND REPORTS MANAGEMENT DIV. GENERAL SERVICES REGIONAL OFFICE BUILDING WASHINGTON 25 D.C. 20407	NONE	NONE	3	1	1	NONE	NONE
TO							
TO							
TO							

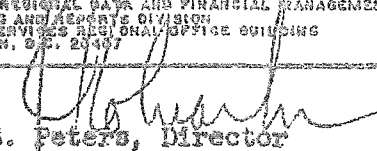
DIRECT ADDRESSES TO 202-343 Attn: 2029 Rm: Transportation Attn: 4049 Rm: Storage		GENERAL SERVICES ADMINISTRATION TRANSPORTATION AND COMMUNICATIONS SERVICE General Services Building Washington, D. C. 20405 SHIPPING INSTRUCTIONS UPGRADING OF MATERIAL		DATE 5/23/68 CONTRACT NUMBER GS-COP-23252(SCM)-38 (RETURN FROM UPGRADING)
1. TO Fansteel Metallurgical Corporation Route 5, Box 238 Muskogee, Oklahoma 74401		2. DATE DUE: NOW 3. CUSTOMS FORMALITIES WILL BE ATTACHED TO BY		
7. POINT OF ORIGIN Muskogee, Oklahoma				
8. AS YOU ARE AUTHORIZED TO SHIP THE MATERIAL DESCRIBED BELOW WHEN NOTIFICATION IS RECEIVED FROM THE INSPECTION DIVISION OF THIS ADMINISTRATION ADVISING THAT THE MATERIAL HAS BEEN RELEASED.				
9. SHIPPING MARKS AS SHOWN IN THE CONTRACT INCLUDING ABOVE CONTRACT NUMBERS MUST APPEAR ON ALL DOCUMENTS AND INVOICES.				
10. CONSIGN TO: GENERAL SERVICES ADMINISTRATION - PMDS c/o GSA-PMDS Gadsden Depot Gadsden, Alabama 35901				

DELIVERY TERMS: FOB Muskogee, Oklahoma, Freight Prepaid

10. CARRIER Jones Truck Lines, Inc. & Conn.		RATE: 290¢ CWT	13. RATE OF SHIPMENT AND MAXIMUM DAILY HANDLING CAPACITY AT DESTINATION MONDAY THROUGH FRIDAY EXCLUSIVE OF HOLIDAYS TRUCK DELIVERY HOURS MONDAY THROUGH FRIDAY A.M. P.M.
11. TYPE OF EQUIPMENT REQUIRED Closed truck, clean and sound		AUTH: SMCRC-505C	
12. EACH SHIPMENT TO BE LOADED IN ACCORDANCE WITH CARRIER'S RULES AND REGULATIONS INCLUDING OBSERVANCE OF APPLICABLE MINIMUM WEIGHT OF 2000 lbs.			
14. DESCRIPTION OF MATERIAL (including total units and weights) COLUMBIUM METAL POWDER, IN 4 DRUMS WEIGHING 1,906 LBS. NET AND 2,026 LBS. GROSS			
LOT NO.	NO. DRUMS	NET WT.	GROSS WT.
16	1	484	514
17	1	474	504
18	1	474	504
19	1	474	504

15. ADDITIONAL INSTRUCTIONS:

- Prepare commercial bill of lading in accordance with these shipping instructions and Contract Article III-C6. Indicate description as POWDER METALS, RVN 40¢ per lb. Also indicate thereon the same notations contained in previous instructions covering converted material on this contract.
- Material shall be weighed as per contract Article IVC in the presence of a GSA Inspector.

ENCLOSURES: DOCUMENT INSTRUCTIONS - GSA FORM 230 GOVERNMENT USE	NOTE: UPON RECEIPT OF MATERIAL, SUBMIT RECEIVING REPORTS, GSA FORM 131 IN QUADRUPPLICATE TO: GENERAL SERVICES ADMINISTRATION OFFICE OF REGIONAL DATA AND FINANCIAL MANAGEMENT ACCOUNTING AND REPORTS DIVISION GENERAL SERVICES REGIONAL OFFICE BUILDING WASHINGTON, D. C. 20405
	APPROVED  FOR John S. Peters, Director Traffic Services Division, TTS

COPIES HAVE BEEN DISTRIBUTED AS LISTED BELOW

2	CONSIGNEE - SEE NOTE #1	COMPTON/DMO sps4	CONSIGNEE/Box
		COMPTON/DR1	Fansteel Metallurgical Corp.
		COMPTON/DM1	No. 1 Tantalum Place
		OFFICIAL FILE - TTS	North Chicago, Ill. 60064
2	INSPECTION - ORIGIN - Dallas	REASING FILE - TTS (Dom. SCM)	
2	INSPECTION - ORIGIN - Atlanta	2	ORFPM - SCRAP (D.C.)
2	REG. DIR. - 70, 71		TTSR

* INCLUDE ZIP CODE, IF APPLICABLE

CPI/EC

GSA FORM 100

SHIPPING NOTICE

Metals Group
FANSTEEL
METALLURGICAL CORPORATION



NUMBER ONE TANTALUM PLACE
NORTH CHICAGO, ILLINOIS • 60064

08

SALESMAN	SALES TERR.	CUST. CODE	ST.	TAX	DATE REC'D.	CUST. ORDER NO. AND DATE	INVOICE	PART-P COPIES	DATE SHIPPED	ORDER NO.
LIADIS/LIADIS	3-1-0432	998-49			02-22-66	GS-00P 02-21-66		7	5/23/68	090314
SOLD TO					SHIP TO				SHIPPED WITH ORDER NO.	

**GENERAL SERVICES ADMINISTRATION
OFFICE OF REGIONAL DATA AND FINANCIAL
MANAGEMENT ACCOUNTS PAYABLE BRANCH
7TH AND -D- STREETS
WASHINGTON, D.C. 20407**

**SAME
C/O GSA-PMDS GADSDEN DEPOT
GADSDEN, ALABAMA 35901**

REQUESTED ROUTING BEST WAY PREPAY AND ADD		CODE		F.O.B. MUSKOGEE		TERMS NET 30 DAYS		D.O. RATING AND CONTRACT NO. ZO		
DESCRIPTION		Item	ACCT.	PROD. CODE	QUAN. PRIOR TO THIS SHIPMENT	QUANTITY SHIPPED	Unit *	UNIT PRICE	TRADE DISC.	NET AMOUNT
FANSTEEL PART NO.	CUSTOMER PART NO.									
9 7 5 3					5 3	5 3		6 4 2		6 4 2
CONVERSION OF GOVERNMENT FURNISHED TANTALUM AND COLUMBIUM BEARING MATERIAL /TIN SLAG/ TO COLUMBIUM METAL POWDER		6		898	6106.000 /2770.589 K/	1903.000 /863.200 K/	P			
LOT #16	484 LBS									
LOT #17	469 LBS									
LOT #18	474 LBS									
LOT #19	476 LBS									

NO. PACKAGES 4 DRUMS	WEIGHT 2015 LBS	TRANS./ INSURANCE	INVOICE NO.	SHIPPED VIA JONES TRUCK LINES B/L 93181 - PREPAID
--------------------------------	---------------------------	-------------------	-------------	---

*UNIT: K - KG. S - SQ. IN. E - EACH I - INCH R - METER
P - LB. A - SQ. FT. M - THOUSAND F - FEET X - THOUSAND METERS
T - TROY OZ. L - LOT Y - THOUSAND FT.

XXX PARTIAL SHIPMENT
____ COMPLETE SHIPMENT

PACKING SLIP
145541

4

190-10

STRAIGHT BILL OF LADING - SHORT FORM

ORIGINAL - NOT NEGOTIABLE

Shipper's No.

93181

CARRIER: Jones Truck Lines

Carrier's No.

At Muskogee, Oklahoma 5/23/68 19

From FANSTEEL METALLURGICAL CORPORATION

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classifications in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment. Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to General Services Administration, PMDS c/o GSA-PMDS Gadsden Depot

(Mail or street address of consignee—For purposes of notification only.)

Destination Gadsden State Alabama County Delivery Address ☆

(☆To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route Jones Truck Lines

Delivering Carrier Car or Vehicle Initials No.

No. Packages	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* WEIGHT (Sub. to Car.)	Class or Rate	Ck. Col.
	BOXES Rectifiers - Dry - NOI			
	BOXES Rectifier Parts			
	BOXES BATTERY FLUID - NOI in glass in boxes WHITE LABEL APPLIED			
	BOXES SWITCH PARTS, other than Switch Boxes or Cabinets or Telephone Switch Boards			
	BOXES CIRCUIT BREAKERS OR SWITCHES or Parts thereof - NOI			
	BOXES BRASS, BRONZE OR COPPER SCREWS - NOI Plated or Not Plated			
	BOXES HEAT EXCHANGERS - NOI Air, Gas, or Liquid			
	BOXES AS METAL, NOI OR METAL ALLOYS, NOI. Rel. Value not exc. 40 cents per lb.			
	BOXES AS CHEMICALS, NOI - Rel. Value not exc. cents per lb.			
4	DRUMS: Columbian Metal Powder (METAL NOI, RVNK 40¢ per Lb.)			
	Net Weight 1,903 Lbs.	2,015 Lbs.	2.90/CWT	
	Contract No. GS-OOP-23252 (SCM)			
	The material shipped hereunder is the property of the U.S. Government. The actual freight charges paid to the carrier by the shipper are to be reimbursed by the Gov't.			
	Equal Employment Opportunity - The non-discrimination clauses contained in Section 202 of Executive Order 11240 as amended, relative to equal employment opportunity for all persons without regard to race, creed, color or national origin, and the implementing rules or regulations as prescribed by the Secretary of Labor are incorporated herein.			

Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement:

The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

(Signature of consignor.)

If charges are to be prepaid, write or stamp here, "To be Prepaid."

TO BE PREPAID

Received \$ to apply in prepayment of the charges on the property described hereon:

Agent or Cashier.

Per (The signature here acknowledges only the amount prepaid.)

Charges advanced:

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding 40¢

per Lb.

FANSTEEL METALLURGICAL CORPORATION, Shipper, Per

Permanent post-office address of shipper: NORTH CHICAGO, ILLINOIS

T. S. Carlile, Jr.

Agent Jones Truck Lines Per

†The fibre boxes used for this shipment conform to the specifications set forth in the box maker's certificate thereon, and all other requirements of Consolidated Freight Classification.

†(Shipper's imprint in lieu of stamp; not a part of bill of lading approved by the Interstate Commerce Commission.)

190-10

THIS MEMORANDUM is an acknowledgment that a bill of lading has been issued and is not the Original Bill of Lading, nor a copy or duplicate, covering the property named herein, and is intended solely for filing or record.

CARRIER: Jones Truck Lines

Shipper's No.

93181

Carrier's No.

RECEIVED, subject to the classifications and tariffs in effect on the date of this receipt by the carrier of the property described in the Original Bill of Lading.

At Muskogee, Oklahoma 5/23/68 19

From FANSTEEL METALLURGICAL CORPORATION

the property described below, in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below, which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed, as to each carrier of all or any of said property over all or any portion of said route to destination, and as to each party at any time interested in all or any of said property, that every service to be performed hereunder shall be subject to all the terms and conditions of the Uniform Domestic Straight Bill of Lading set forth (1) in Official, Southern, Western and Illinois Freight Classifications in effect on the date hereof, if this is a rail or a rail-water shipment, or (2) in the applicable motor carrier classification or tariff if this is a motor carrier shipment.

Shipper hereby certifies that he is familiar with all the terms and conditions of the said bill of lading, including those on the back thereof, set forth in the classification or tariff which governs the transportation of this shipment, and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

Consigned to General Services Administration, FMDS c/o GSA-FMDS Gadsden Depot

(Mail or street address of consignee—For purposes of notification only.)

Destination Gadsden State Alabama County

Delivery Address ☆

(☆To be filled in only when shipper desires and governing tariffs provide for delivery thereat.)

Route Jones Truck Lines

Delivering Carrier

Car or Vehicle Initials

No.

No. Packages	KIND OF PACKAGE, DESCRIPTION OF ARTICLES, SPECIAL MARKS, AND EXCEPTIONS	* WEIGHT (Sub. to Cor.)	Class or Rate	Ck. Col.	
	BOXES Rectifiers - Dry - NOI				Subject to Section 7 of Conditions of applicable bill of lading, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
	BOXES Rectifier Parts				
	BOXES BATTERY FLUID - NOI in glass in boxes WHITE LABEL APPLIED				
	BOXES SWITCH PARTS; other than Switch Boxes or Cabinets or Telephone Switch Boards				
	BOXES CIRCUIT BREAKERS OR SWITCHES or Parts thereof - NOI				
	BOXES BRASS, BRONZE OR COPPER SCREWS - NOI Plated or Not Plated				
	BOXES HEAT EXCHANGERS - NOI Air, Gas, or Liquid				(Signature of consignor.)
	BOXES AS METAL, NOI OR METAL ALLOYS, NOI Rel. Value not exc. .40 cents per lb.				If charges are to be prepaid, write or stamp here, "To be Prepaid."
	BOXES AS CHEMICALS, NOI - Rel. Value not exc. cents per lb.				TO BE PREPAID
4	DRUMS: Columbian Metal Powder (METAL NOI, RVN 40¢ per Lb.)				Received \$
	Net Weight 1,903 Lbs.	2,015 Lbs.	2.90/CWT		to apply in prepayment of the charges on the property described hereon.
	Contract No. GS-GOF-23252 (SCM)				Agent or Cashier.
	The material shipped hereunder is the property of the U.S. Government				Per
	The actual freight charges paid to the carrier by the shipper are to be reimbursed by the Gov't.				(The signature here acknowledges only the amount prepaid.)
	Equal Employment Opportunity - The non-discrimination clauses contained in Section 202 of Executive Order 11240 as amended, relative to equal employment opportunity for all persons without regard to race, creed, color or national origin, and the implementing rules or regulations as prescribed by the Secretary of Labor are incorporated herein.				Charges advanced:

*If the shipment moves between two ports by a carrier by water, the law requires that the bill of lading shall state whether it is carrier's or shipper's weight.

NOTE—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding **.40¢** per Lb.

FANSTEEL METALLURGICAL CORPORATION, Shipper, Per

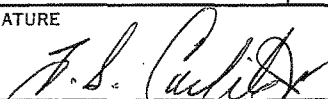
Permanent post-office address of shipper: NORTH CHICAGO, ILLINOIS

T. S. Carillo, Jr.

Agent Jones Truck Lines Per

④

4

GENERAL SERVICES ADMINISTRATION DEFENSE MATERIALS SERVICE STOCKPILE DIVISION OUTBOUND STORAGE REPORT (See Instructions on Reverse)		REPORT NO. 2029		COMMODITY Columbium Metal Powder		RELEASE OR S/I NO. 38			
		WAREHOUSE		TANK OR PILE NO.		DESTINATION GSA-PMS Gadsden Depot			
		LOCATION Fansteel, Inc. Muskogee, Oklahoma		SALE CONTRACT NO. GS-00F-23252 (SCN)		Gadsden, Alabama			
RECEIVING REPORT NO.	DATE OUT	EX. CONTRACT OR NSP NUMBER	GRADE	NUMBER		PACKAGES		WEIGHT	
				B/L	CAR	NO.	TYPE	GROSS	NET
	5/23/68		Columbium Metal Powder G.S.A. Lot No. 16 17 18 19			1 1 1 1	DRUM " " "	511 Lbs. 498 " 503 " 503 "	484 Lbs. 469 " 474 " 476 "
I certify that the material listed was released as shown.			SIGNATURE 		TITLE Plant Purchasing Agent			DATE 5/23/68	

INSTRUCTIONS

1. The storage installation will complete this form for all strategic and critical materials shipped out. Only one commodity will be listed on a report. For bulk ores and materials stored in tanks, separate reports are required for each pile or tank. The original and three copies will be forwarded to the following address within 3 working days after the entire shipping instruction quantity has been shipped, or to cover each week's shipments, whichever is sooner.

General Services Administration Region 3
Office of Regional Data and Financial Management
Property and Inventory Section
Washington, D. C. 20407

2. Reports are to be numbered consecutively, beginning with 2001, for all strategic materials shipped which were carried in the depot inventory records as SCM, D, or DMP, material at time of shipment. SCM reports will show the number only; i. e., 2001; D and DMP reports will show the number followed by the letter "D"; i. e., 2002-D. A separate series of numbers, beginning with 2001, is to be used for all strategic materials shipped which were carried in the depot inventory records as CCC material at time of shipment. These reports will show the number followed by the letters CCC; i. e., 2001-CCC.
3. The inbound Receiving Report No. and ex Contract No. must be shown for those materials stored by lot and where such identity is maintained.
4. In the column headed "Weight" the following procedure shall apply unless otherwise directed:
 - a. For those materials on which lot identity is not maintained, such as metals, bulk ores, oils, and cordage fiber, the weight shown on this report will be the net weight as determined by depot personnel either by actual weighing or on an estimated basis, as directed by the shipping release.
 - b. For those materials on which lot identity is maintained, such as crude rubber, feathers and down, and silk, the weight shown on this report will be the net inbound weight. Normally this will be the weight ordered shipped. However, when the number of units shipped differs from the number of units specified in the shipping release, weight adjustments will be made based on the average unit weight.
 - c. The weight posted to the Inventory Record Card, GSA Form 46, will always be the net weight shown on this report. When it is determined that the balance on the GSA Form 46 differs from that physically on hand, either debit or credit, the Stockpile Division, DMS, GSA, shall be advised so that instructions regarding adjustments may be issued.

WEIGHT CERTIFICATE

SHIPPED TO:

General Services Administration, PMS
c/o GSA-PMS Gadson Depot
Gadson, Alabama

SHIPPED FROM:

Pearsteel, Inc.
Metals Division
Route 5, Box 238
Madroge, Oklahoma 74401

GSA: CONTRACT NO.: GS-00F-23276 (SOL)

DATE: May 23, 1968

MATERIAL DESCRIPTION: Columbian Metal Powder

GSA: Lot No.	Drum/Box No.	Gross Weight	Tare Weight	Net Weight	Pearsteel Lot No.
16	1	511 lbs.	27 lbs.	484 lbs.	16
17	1	498 "	29 "	469 "	17
18	1	503 "	29 "	474 "	18
19	1	503 "	27 "	476 "	19

I hereby certify that the above weights are correct to the best of my knowledge.

F. S. Canille, Jr.
F. S. CANILLE, JR.
Plant Purchasing Agent

PEARSTEEL, INC.

Weights for above material accepted:

C. T. Buell
C. T. BUELL, INSPECTOR

WEIGHT CERTIFICATE

SHIPPED TO:

General Services Administration, PMDS
c/o CSA-PMDS Gadsden Depot
Gadsden, Alabama

SHIPPED FROM:

Fansteel, Inc.
Metals Division
Route 5, Box 238
Muskogee, Oklahoma 74401

G.S.A. CONTRACT NO.: GS-00P-23252 (SCM)

DATE: May 23, 1968

MATERIAL DESCRIPTION: Columbian Metal Powder

<u>G.S.A. Lot No.</u>	<u>Drum/Box No.</u>	<u>Gross Weight</u>	<u>Tare Weight</u>	<u>Net Weight</u>	<u>Fansteel Lot No.</u>
16	1	511 Lbs.	27 Lbs.	484 Lbs.	16
17	1	498 "	29 "	469 "	17
18	1	503 "	29 "	474 "	18
19	1	503 "	27 "	476 "	19

I hereby certify that the above weights are correct to the best of my knowledge.

T. S. Carlile, Jr.
T. S. CARLILE, JR.
Plant Purchasing Agent

FANSTEEL, INC.

Weights for above material accepted:

C. T. Buel
C. T. BUEL, INSPECTOR

FANSTEEL**An Industry that Serves Industries**DEXTER 6-4900
TELETYPEWRITER
N CG807**FANSTEEL METALLURGICAL CORPORATION**
NORTH CHICAGO, ILLINOIS, U. S. A.**WIRE
COMMUNICATION**A ☐ Send at onceB ☐ Send on next scheduled transmittal

Teletype No. ►

Date Sent ►

Attention ► Mrs. S. Cohen

TO General Services Administration
Washington, D. C.

Reference: Call No. 710-822-1960 - Contract No. GS-OOP-23252 (SCM)

Please release the following Columbium Metal Powder Lots for immediate
shipment:

Lot No. 16	484 Lbs. Net Wt.	514 Lbs. Gross Wt.
17	474 Lbs. Net Wt.	504 Lbs. Gross Wt.
18	474 Lbs. Net Wt.	504 Lbs. Gross Wt.
19	474 Lbs. Net Wt.	504 Lbs. Gross Wt.

Notice of availability, Form 199, being mailed to your attention this date.

CONFIRMATION

122-01

GENERAL SERVICES ADMINISTRATION - TRANSPORTATION AND COMMUNICATIONS SERVICE
WASHINGTON, D. C. 20405

APPLICATION FOR SHIPPING INSTRUCTIONS AND NOTICE OF AVAILABILITY
(MATERIALS MOVING BY OTHER THAN OCEAN VESSEL)

IMPORTANT: In order that this Service may arrange for the most economical transportation, all information requested herein **MUST BE** furnished as accurately as possible. *Read instructions on reverse of this form.*

1. NAME AND ADDRESS OF APPLICANT Fansteel Metallurgical Corporation Metals Division Route 5, Box 238 Muskogee, Oklahoma 74401		2. DATE OF APPLICATION May 14, 1968			
		3. CONTRACT NO. (Include all symbols) GS-00P-23252 (SCM)			
		4. DATE SHIPMENT AVAILABLE Immediately			
5. NAME OF SHIPPER Fansteel Metallurgical Corporation		6. POINT OF ORIGIN (Show name and address of facility from which shipment will be made) Fansteel Metallurgical Corporation Route 5, Box 238 Muskogee, Oklahoma 74401			
7. NAME OF ORIGIN RAILROAD CARRIER(S) K. O. and G.					
7A. IF RAILROAD MOVEMENT, INDICATE (By check)		7C. IF TRUCK MOVEMENT, INDICATE (1) HIGHWAY IDENTIFICATION NO. 62 (2) LOCATION OF NEAREST CERTIFIED PRIVATE OR PUBLIC SCALE Consumers Co-op Asian Fertilizer Plant 222 East Shawnee - Muskogee, Oklahoma 74401			
7B. IF INLAND WATER MOVEMENT (Fill in) (1) NAME OF WATERWAY - (2) LOADING DRAFT -					
8. ADVISE WHETHER TRANSIT PRIVILEGES APPLICABLE (If "YES" show name of inbound carrier) <div style="display: flex; justify-content: space-around;"> NO YES </div>					
9. COMMODITY TENDERED (As described in contract and including lot number, marks, type and number of containers, or if loose, strapped, in bulk, etc., and specification number(s), if any) Columbium Metal Powder Lot No. 16 - 1 Drum, 484 Lbs. Net Wt., 514 Lbs. Gross Wt. 17 - 1 Drum, 474 Lbs. Net Wt., 504 Lbs. Gross Wt. 18 - 1 Drum, 474 Lbs. Net Wt., 504 Lbs. Gross Wt. 19 - 1 Drum, 474 Lbs. Net Wt., 504 Lbs. Gross Wt.		9A. WEIGHT (Show unit of measure: pounds, short tons, long tons, etc.)			
		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">NET</td> <td style="width: 50%;">GROSS</td> </tr> <tr> <td>1,906 Lbs.</td> <td>2,026 Lbs.</td> </tr> </table>		NET	GROSS
NET	GROSS				
1,906 Lbs.	2,026 Lbs.				
10. SHOW THE NUMBER OF CONVEYANCES THAT CAN BE LOADED EACH DAY (MONDAY THROUGH FRIDAY)					
BOX CARS	GONDOLA CARS	HOPPER CARS	OTHERS		
11. DELIVERY TERMS (As specified in contract, FAS - FOB, etc.) F.O.B. Origin - Freight Prepaid		12. SIGNATURE OF APPLICANT T. S. Carlile, Jr.			
		13. TITLE Plant Purchasing Agent			
DO NOT WRITE IN SPACES BELOW - FOR GENERAL SERVICES ADMINISTRATION USE ONLY					
TO: Stockpile Storage Operations Division, PMDS		TO: Shipping and Claims Branch, TTCS			
BY	DATE	BY	DATE		
STORAGE POINT		STORAGE CONTRACT NO.	SPA NO.		
CONSIGNEE		KIND OF CARS REQUIRED	NUMBER OF TRUCKS		
DELIVERING CARRIER(S)		NUMBER OF CARS PER DAY	TRUCK DELIVERY HOURS		
ROUTE					
CLASSIFICATION OR TARIFF DESCRIPTION, FREIGHT RATE AND SPECIAL QUOTATION AUTHORITY, IF ANY (To be shown on bill of lading)					
IF RECEIVED BY PHONE (To be confirmed) BY		FROM	DATE		

INSTRUCTIONS FOR THE PREPARATION AND DISTRIBUTION OF GSA FORM 199

A. It is important that this form be mailed (airmail to avoid delay) not less than 10 days in advance of the anticipated date of availability of the material.

Mail original and duplicate

TO: General Services Administration
Transportation and Communications Service
Shipping and Claims Branch
General Services Building
Washington, D. C. 20405

Mail triplicate copy

TO: General Services Administration
Regional Director
ATTENTION: CHIEF, INSPECTION BRANCH
Property Management and Disposal Service
Region No. and Address*

*For the address and number of the GSA regional office having jurisdiction over the origin point from which the material will be shipped, see the regional office directory below.

- B. (1) Each contractor shall prepare this form (completing all applicable items regardless of the responsibility for forwarding) and mail without delay to the addressees indicated above.
(2) A separate set of forms shall be prepared by the contractor for each month, quarter, or portion thereof when contract provides for such delivery.
(3) In the event that material is ready for shipment from more than one point of origin, a separate form is required for each point.
(4) **NOTICE OF ANY CHANGE IN GSA FORM 199 MUST BE MADE BY THE QUICKEST METHOD OF DISPATCH AND CONFIRMED BY THE ISSUANCE OF A REVISED GSA FORM 199 TO THOSE INDICATED ABOVE.**

C. IT IS IMPORTANT THAT IN NO CASE IS SHIPMENT TO BE MADE BY THE CONTRACTOR UNTIL SUCH TIME AS INSPECTION REQUIREMENTS AS SPECIFIED IN THE CITED CONTRACT HAVE BEEN COMPLIED WITH.

D. Additional copies of GSA Form 199 will be furnished upon request to General Services Administration, Transportation and Communications Service, Contract Administration Division, Shipping and Claims Branch, General Services Building, Washington, D.C. 20405.

REGIONAL OFFICE DIRECTORY

REGION NO.	ADDRESS	ORIGIN POINTS IN.
1 BOSTON	POST OFFICE AND COURT HOUSE BOSTON, MASSACHUSETTS 02109	CONNECTICUT, MAINE, MASSACHUSETTS, NEW HAMPSHIRE, RHODE ISLAND, AND VERMONT.
2 NEW YORK	30 CHURCH STREET NEW YORK, NEW YORK 10007	DELAWARE, NEW JERSEY, NEW YORK, P AND PENNSYLVANIA, CANADA - PROVINCES OF ONTARIO AND QUEBEC.
3 WASH. D. C.	GS REGIONAL OFFICE BUILDING WASHINGTON, D. C. 20407	DISTRICT OF COLUMBIA, MARYLAND, VIRGINIA, WEST VIRGINIA, AND SPRUCE PINE, NORTH CAROLINA.
4 ATLANTA	1776 PEACHTREE STREET, N.W. ATLANTA, GEORGIA 30309	ALABAMA, FLORIDA, GEORGIA, NORTH CAROLINA (EXCEPT SPRUCE PINE), SOUTH CAROLINA, MISSISSIPPI (EXCEPT COUNTIES OF HANCOCK AND HARRISON) AND TENNESSEE.
5 CHICAGO	219 SOUTH DEARBORN STREET CHICAGO, ILLINOIS 60604	ILLINOIS, INDIANA, OHIO, MICHIGAN, KENTUCKY AND WISCONSIN. CANADA - PROVINCE OF MANITOBA.
6 KANSAS CITY	1500 EAST BANNISTER ROAD KANSAS CITY, MISSOURI 64131	IOWA, KANSAS, MINNESOTA, MISSOURI, NORTH DAKOTA, NEBRASKA (EXCEPT SIDNEY), AND SOUTH DAKOTA (EXCEPT CUSTER)
7 FT. WORTH	819 TAYLOR STREET FORT WORTH, TEXAS 76102	ARKANSAS, LOUISIANA, OKLAHOMA, TEXAS, AND COUNTIES OF HANCOCK AND HARRISON IN MISSISSIPPI.
8 DENVER	BUILDING 41 DENVER FEDERAL CENTER DENVER, COLORADO 80225	ARIZONA, COLORADO, MONTANA, NEW MEXICO, UTAH, WYOMING, SIDNEY, NEBRASKA, AND CUSTER, SOUTH DAKOTA.
9 SAN FRANCISCO	49 FOURTH STREET SAN FRANCISCO, CALIF. 94103	CALIFORNIA, NEVADA, AND GRANTS PASS, OREGON.
10 AUBURN	GSA CENTER AUBURN, WASHINGTON 98002	IDAHO, OREGON (EXCEPT GRANTS PASS) AND WASHINGTON, CANADA - PROVINCES OF ALBERTA AND BRITISH COLUMBIA.

GENERAL SERVICES ADMINISTRATION - TRANSPORTATION AND COMMUNICATIONS SERVICE
WASHINGTON, D. C. 20405

APPLICATION FOR SHIPPING INSTRUCTIONS AND NOTICE OF AVAILABILITY
(MATERIALS MOVING BY OTHER THAN OCEAN VESSEL)

IMPORTANT: In order that this Service may arrange for the most economical transportation, all information requested herein **MUST BE** furnished as accurately as possible. *Read instructions on reverse of this form.*

1. NAME AND ADDRESS OF APPLICANT Fanstee! Metallurgical Corporation Metals Division Route 5, Box 238 Muskogee, Oklahoma 74401		2. DATE OF APPLICATION May 14, 1968						
		3. CONTRACT NO. (Include all symbols) GS-007-23252 (SCM)						
		4. DATE SHIPMENT AVAILABLE Immediately						
5. NAME OF SHIPPER Fanstee! Metallurgical Corporation		6. POINT OF ORIGIN (Show name and address of facility from which shipment will be made) Fanstee! Metallurgical Corporation Route 5, Box 238 Muskogee, Oklahoma 74401						
7. NAME OF ORIGIN RAILROAD CARRIER(S) E. O. and G.		7C. IF TRUCK MOVEMENT, INDICATE (1) HIGHWAY IDENTIFICATION NO. 62 (2) LOCATION OF NEAREST CERTIFIED PRIVATE OR PUBLIC SCALE Consumers Co-op Assoc. Fertilizer Plant 222 East Shawnee - Muskogee, Oklahoma 74401						
7A. IF RAILROAD MOVEMENT, INDICATE (By check)								
7B. IF INLAND WATER MOVEMENT (Fill in) (1) NAME OF WATERWAY . (2) LOADING DRAFT .								
8. ADVISE WHETHER TRANSIT PRIVILEGES APPLICABLE (If "YES" show name of inbound carrier) <div style="display: flex; justify-content: space-around;"> NO YES </div>								
9. COMMODITY TENDERED (As described in contract and including lot number, marks, type and number of containers, or if loose, strapped, in bulk, etc., and specification number(s), if any) Columbian Metal Powder Lot No. 16 - 1 Drum, 484 Lbs. Net Wt., 504 Lbs. Gross Wt. 17 - 1 Drum, 474 Lbs. Net Wt., 504 Lbs. Gross Wt. 18 - 1 Drum, 474 Lbs. Net Wt., 504 Lbs. Gross Wt. 19 - 1 Drum, 474 Lbs. Net Wt., 504 Lbs. Gross Wt.		9A. WEIGHT (Show unit of measure: pounds, short tons, long tons, etc.) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">NET</td> <td style="width:50%;">GROSS</td> </tr> <tr> <td align="center">1,906 Lbs.</td> <td align="center">2,026 Lbs.</td> </tr> </table>		NET	GROSS	1,906 Lbs.	2,026 Lbs.	
NET	GROSS							
1,906 Lbs.	2,026 Lbs.							
10. SHOW THE NUMBER OF CONVEYANCES THAT CAN BE LOADED EACH DAY (MONDAY THROUGH FRIDAY) <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">BOX CARS</td> <td style="width:25%;">GONDOLA CARS</td> <td style="width:25%;">HOPPER CARS</td> <td style="width:25%;">OTHERS</td> <td style="width:25%;">TRUCKS</td> </tr> </table>				BOX CARS	GONDOLA CARS	HOPPER CARS	OTHERS	TRUCKS
BOX CARS	GONDOLA CARS	HOPPER CARS	OTHERS	TRUCKS				
11. DELIVERY TERMS (As specified in contract, FAS - FOB, etc.) F.O.B. Origin - Freight Prepaid		12. SIGNATURE OF APPLICANT T. S. Carlile, Jr. <i>T. S. Carlile Jr.</i> 13. TITLE Plant Purchasing Agent						
DO NOT WRITE IN SPACES BELOW - FOR GENERAL SERVICES ADMINISTRATION USE ONLY								
TO: Stockpile Storage Operations Division, PMDS BY _____ DATE _____		TO: Shipping and Claims Branch, TTCS BY _____ DATE _____						
STORAGE POINT _____		STORAGE CONTRACT NO. _____ SPA NO. _____						
CONSIGNEE _____		KIND OF CARS REQUIRED _____ NUMBER OF TRUCKS _____						
DELIVERING CARRIER(S) _____		NUMBER OF CARS PER DAY _____ TRUCK DELIVERY HOURS _____						
ROUTE								
CLASSIFICATION OR TARIFF DESCRIPTION, FREIGHT RATE AND SPECIAL QUOTATION AUTHORITY, IF ANY (To be shown on bill of lading)								
IF RECEIVED BY PHONE (To be confirmed) BY _____		FROM _____ DATE _____						

138-01

MATERIAL SLIP

J 53031

STOCK MOVEMENT

DATE 5-22-68	PRODUCTION ORDER NO.
FROM DEPT. NO. 808	FACTORY ORDER NO.
TO DEPT. NO. 850	PART NO.
CUSTOMER'S NAME GSA	
DESCRIPTION OF MATERIAL	

GSA CB Pwd	Lot # 16	wt. 423.0 Lbs
" " "	Lot # 17	wt. 468.0 Lbs
" " "	Lot # 18	wt. 474.0 Lbs
" " "	Lot # 19	wt. 476.0 Lbs

WEIGHT TRANSFERRED

1901.0 Lbs

QUANTITY TRANSFERRED

4 Lots (4 Drums)

SENDING FOREMAN

Phillips B. R.

RECEIVING FOREMAN

WHITE FOLLOWS MATERIAL — YELLOW TO OFFICE — PINK IN BOOK

WEIGHT RECORDED BY

Number

#4

Lot #19

Howe

IDENTIFICATION

Date

5-20-68

WEIGHT

0503

lbs. GROSS

0027

lbs. TARE

476

lbs. NET

Commodity

@

per lb.

Remarks:

Driver

On

[]

Off

[]

Load No.

Weigher

Shipper

Seller

Buyer

Address

TR-200-2-Printed in U.S.A.

WEIGHT RECORDED BY

Number H 3

Date 5-20-68

Howe

Lot 18

IDENTIFICATION

WEIGHT

0503 lbs. GROSS

0029 lbs. TARE

474 lbs. NET

Commodity.....@.....per lb

Remarks:.....Driver On [] Off []

Load No.

Weigher Sam. J. Odine

Shipper.....

Seller.....

Buyer.....

Address.....

TR-200-2-Printed in U.S.A.

WEIGHT RECORDED BY

Number # 3

Howe

Date 5-20-68

IDENTIFICATION

Cb Powder
lot 17

WEIGHT

~~0 4 8 6~~
~~0 0 2 9~~

lbs. GRO

lbs. TAI

469

lbs. NI

Commodity.....@.....per

Remarks:.....Driver On [] Off []

Load No.

Weigher *Sam Thelme*

Shipper.....

Seller.....

Buyer.....

Address.....

TR-200-2-Printed in U.S.A.

WEIGHT RECORDED BY

Number #1

Howe

Date 5-20-68

Lot 16

IDENTIFICATION

WEIGHT

0 5 1 1
0 0 2 7

lbs. GROSS

lbs. TARE

484

lbs. NET

Commodity.....@.....per l

Remarks:.....Driver On [] Off []

Load No.

Weigher Tom Malone

Shipper.....

Seller.....

Buyer.....

Address.....

TR-200-2-Printed in U.S.A.

TELEGRAM RECEIVED BY TELEPHONE

S S E

GENERAL SERVICES ADMINISTRATION

ATTENTION MRS S. COHEN: REFERENCE CALL NUMBER
710-822-1960 CONTRACT NUMBER ~~XXXX~~GS-00P-23252
(SOM). PLEASE RELEASE THE FOLLOWING COLUMBIAN METAL
POWDER LOTS FOR IMMEDIATE SHIPMENT. LOT NUMBER 16
484 POUNDS NET WEIGHT 514 K POUNDS GROSS WEIGHT,

LOT NUMBER 12 474 POUNDS NET WEIGHT 504 POUNDS GROSS
WEIGHT. ~~XXX~~ LOT NUMBER 18 474 POUNDS NET WEIGHT
504 GROSS WEIGHT. LOT NUMBER 19 474 POUNDS NET WEIGHT
504 POUNDS GROSS WEIGHT. NOTICE OF AVAILABILITY
FORM 199 BEING MAILED TO YOUR ATTENTION THIS DATE .

WU 550 (1-52)

DATE

EIV MAY 14 1968

CHECK

83 PDB 3 EXTRA

TEL.

NO.

FANSTEEL

DESTIN

WASHDC

SIGNATURE

T S CARLILE JR
PLANT PURCHASING
AGENT FANSTEEL
METALLURGICAL CORP

SUB.

RTE 5

Lat	wt	
16	484 [#]	1 Drum ea
17	474 [#]	30 lb
18	474 [#]	
19	474 [#]	

Colantian pounds WST



SHIPPING NOTICE

Metals Group
FANSTEEL
METALLURGICAL CORPORATION



NUMBER ONE TANTALUM PLACE
NORTH CHICAGO, ILLINOIS • 60064

SALESMAN LIADIS/LIADIS	SALES TERR. 3-1-0432	CUST. CODE 998-49	ST.	TAX	DATE REC'D. 02-22-68	CUST. ORDER NO. AND DATE 65-007 02-21-68	INVOICE	PART-P COMP-C P	DATE SHIPPED 2/21/68	ORDER NO. 090314	
SOLD TO					SHIP TO					SHIPPED WITH ORDER NO.	

GENERAL SERVICES ADMINISTRATION
OFFICE OF REGIONAL DATA AND FINANCIAL
MANAGEMENT ACCOUNTS PAYABLE BRANCH
7TH AND -D- STREETS
WASHINGTON, D.C. 20407

SAME
% GSA-PMDS BINGHAMTON DEPOT
BINGHAMTON, NEW YORK
10139

REQUESTED ROUTING				CODE		F.O.B.		TERMS		D.O. RATING AND CONTRACT NO.			
BEST WAY PREPAY AND ADD						MUSKOGEE		NET 30 DAYS		20			
DESCRIPTION				Item	ACCT.	PROD. CODE	QUAN. PRIOR TO THIS SHIPMENT	QUANTITY SHIPPED	Unit *	UNIT PRICE	TRADE DISC.	NET AMOUNT	
FANSTEEL PART NO.		CUSTOMER PART NO.											5 3
CONVERSION OF GOVERNMENT FURNISHED TANTALUM AND COLUMBIUM BEARING MATERIAL /TIN SLAG/ TO COLUMBIUM METAL POWDER				6		898	8293.000 /769.619 K/	2185.000 /991.116 K/	P	10.02		\$21893.70	
LOT #12 547 LBS													
LOT #13 546 LBS													
LOT #14 545 LBS													
LOT #15 547 LBS													

LOT #12 547 LBS
LOT #13 546 LBS
LOT #14 545 LBS
LOT #15 547 LBS

NO. PACKAGES 4 DRUMS	WEIGHT 2304 LBS	TRANS./ INSURANCE	INVOICE NO.	SHIPPED VIA JONES TRUCK LINES B/L 81576 PREPAID
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*UNIT: K - KG. S - SQ. IN. E - EACH I - INCH R - METER
P - LB. A - SQ. FT. M - THOUSAND F - FEET X - THOUSAND METERS
T - TROY OZ. L - LOT Y - THOUSAND FT.

XXXX
PARTIAL SHIPMENT
COMPLETE SHIPMENT

PACKING SLIP
142467

5

SHIPPING NOTICE

Metals Group
FANSTEEL
METALLURGICAL CORPORATION



NUMBER ONE TANTALUM PLACE
NORTH CHICAGO, ILLINOIS • 60064

08

SALESMAN LIADIS/LIADIS	SALES TERR. 3-1-0482	CUST. CODE 998-49	ST.	TAX	DATE REC'D. 02-22-66	CUST. ORDER NO. AND DATE 85-00P 02-21-66	INVOICE	PART-P COMP-C P	DATE SHIPPED 2/21/68	ORDER NO. 090314
SOLD TO						SHIP TO		SHIPPED WITH ORDER NO.		

GENERAL SERVICES ADMINISTRATION
OFFICE OF REGIONAL DATA AND FINANCIAL
MANAGEMENT ACCOUNTS PAYABLE BRANCH
7TH AND -D- STREETS
WASHINGTON, D.C. 20407

SAME
% GSA-PMDS BINGHAMTON DEPOT
BINGHAMTON, NEW YORK
10139

REQUESTED ROUTING		CODE		F.O.B.	TERMS	D.O. RATING AND CONTRACT NO.				
BEST WAY PREPAY AND ADD				MUSKOGEE	NET 30 DAYS	20				
DESCRIPTION				PROD.	QUAN. PRIOR	QUANTITY	Unit	UNIT PRICE	TRADE	NET AMOUNT
FANSTEEL PART NO.	CUSTOMER PART NO.	Item	ACCT.	CODE	TO THIS SHIPMENT	SHIPPED	*		DISC.	
9 7 5 3					5 3	5 3		6 4 2		6 4 2
CONVERSION OF GOVERNMENT FURNISHED TANTALUM AND COLUMBIUM BEARING MATERIAL /TIN SLAG/ TO COLUMBIUM METAL POWDER		6		898	8293.000 /789.819 K/	2185.000 /991.116 K/	P			
LOT #12 547 LBS										
LOT #13 546 LBS										
LOT #14 545 LBS										
LOT #15 547 LBS										

NO. PACKAGES 4 DRUMS	WEIGHT 2304 LBS	TRANS./ INSURANCE	INVOICE NO.	SHIPPED VIA JONES TRUCK LINES B/L 81576 PREPAID
--------------------------------	---------------------------	-------------------	-------------	---

*UNIT: K - KG. S - SQ. IN. E - EACH I - INCH R - METER
P - LB. A - SQ. FT. M - THOUSAND F - FEET X - THOUSAND METERS
T - TROY OZ. L - LOT Y - THOUSAND FT.

XXXX
PARTIAL SHIPMENT
COMPLETE SHIPMENT

PACKING SLIP
142467

4

C. L. Brown

GENERAL SERVICES ADMINISTRATION



Property Management and Disposal Service
Washington, D.C. 20405

MAR 23 1967

IN REPLY REFER TO: DDSMO

Mr. C. E. LeRoy
Vice President
Fansteel Metallurgical Corporation
Number One Tantalum Place
North Chicago, Illinois 60064

Dear Mr. LeRoy:

Enclosed for your record is one fully executed copy of Amendment No. 1 to Contract No. GS-00P-23252(SCM), which provides for the substitution of 25,449 pounds of cobalt for a comparable value of tin as payment for services rendered under the contract.

Sincerely yours,

D. A. Woodard

D. A. Woodard
Project Manager, Minerals and Ores
Industry Materials Division
Strategic and Critical Materials Disposal

Enclosure

Keep Freedom in Your Future With U.S. Savings Bonds

AMENDMENT NO. 1
to
CONTRACT NO. GS-OOP-23252(SCM)
between
THE GENERAL SERVICES ADMINISTRATION
and
FANSTEEL METALLURGICAL CORPORATION

THIS AMENDMENT, entered into between the United States of America (hereinafter called the Government), acting by and through the Administrator of General Services, represented by the Contracting Officer executing this amendment, and Fansteel Metallurgical Corporation (hereinafter called the Contractor).

WITNESSETH:

WHEREAS, the Government on December 13, 1965, and the Contractor entered into Contract No. GS-OOP-23252(SCM), under which the Contractor would render services in connection with conversion of Government-furnished tantalum and columbium bearing material to tantalum metal powder, tantalum metal slabs, columbium metal powder, and columbium oxide powder; and

WHEREAS, by letter of February 16, 1967, the performance period for this contract by the Contractor has been extended to December 13, 1967; and

WHEREAS, the payment to the Contractor for the conversion of the raw materials to the above-listed upgraded products, and all transportation charges paid for the account of the Government by the Contractor were to be made with Government-owned materials as listed in Article XI, "Payments," of the Special Terms and Conditions of the contract; and

WHEREAS, by letter of March 6, the Contractor requested that cobalt metal granules listed as Item No. 562 in Addendum No. 1 to Exhibit I of GSA Solicitation for offers for Cobalt PMDS-MET-141, dated January 18, 1967, be substituted as payment material in lieu of a comparable value of tin; and

WHEREAS, the Government and the Contractor find it mutually advantageous to substitute the following material located at GSA-PMDS Belle Mead Depot, Belle Mead, New Jersey, amounting to approximately 25,449 pounds of cobalt contained at \$1.70 per pound for a total of approximately \$43,263.30:

<u>ITEM NO.</u>	<u>LOT NO.</u>	<u>NO. OF DRUMS</u>	<u>QUANTITY-POUNDS OF COBALT CONTAINED</u>
562	123-4-13F	51	25,449
<u>PERCENTAGE BY WEIGHT</u>			
Co	99.77	Ni 0.16	Fe 0.14
C	0.05	Cu 0.14	S 0.02
P	0.01		

The cobalt content and other analytical data shown above were obtained from Government records and are believed to be correct but no warranties are made as to chemical analysis or physical condition.

NOW THEREFORE, the parties hereto agree that the contract as extended for performance be further amended as follows:

Paragraph XI of the Special Terms and Conditions is amended by adding subparagraph C.5.

5. COBALT

- a. Cobalt contained in Item No. 562, Lot No. 123-4-13F, as further described in Addendum 1 to Exhibit I in aforesaid Solicitation PMDS-MET-141, consisting of 51 drums, is available for delivery to the Contractor by the Government; it has a value of approximately \$43,263.30 for purposes of payment under this contract.
- b. This cobalt material for payment will be taken "as-is" by the Contractor and the \$43,263.30, or the dollar amount determined in accordance with subparagraphs 5.d. and 5.e. below, applied to the amount due for upgrading services on the raw materials furnished therefor, and in lieu of a comparable value of pig tin as a payment material.
- c. Delivery terms for the cobalt will be as set forth in Special Terms and Conditions XI.B., herein.
- d. Weights as marked on the containers shall govern for net and tare. If the containers are not so marked, producer's weights of record with the Government shall be used, or the net weight shall be determined by draft weighing on Government platform scales at the storage facility, with an allowance for the established tare weight.
- e. The contained weight of cobalt delivered hereunder shall be computed by multiplying the net weight of the item, as determined in accordance with paragraph 5.d. above, by the percentage of contained cobalt set forth for Item 562, and shall be final for payment purposes.

All other terms and conditions of the contract remain unchanged.

ACCEPTED BY THE PURCHASER:

By

Title

Date

[Signature]
Vice President
 3/17/67
[Signature]

ACCEPTED BY THE GOVERNMENT:

By

Title

Date

[Signature]
 D. A. Woodard
 Project Manager, Minerals and Ores
 March 22, 1967



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
VIA ELECTRONIC MAIL

Cabot Corporation
Sean D. Keohane, President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210
karen.kalita@cabotcorp.com

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Cabot Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/2/2021 9:32:42 PM
To: Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: Fansteel Metals 104(e) Information Request

FYI

From: Catherine Crow - LR <catherine.crow@gsa.gov>
Sent: Monday, February 1, 2021 4:26 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Katharine Healy - LR <katharine.healy@gsa.gov>
Subject: Re: Fansteel Metals 104(e) Information Request

Lance,

Kris Durmer is no longer with GSA. Our current General Counsel is Nitin Shah. You may send future correspondence regarding this matter and similar requests to Kate Healy at katharine.healy@gsa.gov. She is also copied on this email.

Sincerely,

Catherine Crow
Acting Associate General Counsel
Real Property Division (LR), GSA Office of General Counsel
(202) 501-4536

The information contained in this e-mail message is intended only for the addressee(s) and may be protected by the attorney-client privilege and/or work product doctrine. Please do not forward or further disseminate this message without the consent of the sender.

On Mon, Feb 1, 2021 at 3:09 PM Nixon, Lance <Nixon.Lance@epa.gov> wrote:

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer

U.S. Environmental Protection Agency

Superfund and Emergency Management Division

Assessment and Enforcement Branch

214-665-2203

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/1/2021 8:22:47 PM
To: karen.kalita@cabotcorp.com
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: Fansteel Metals 104(e) Information Request
Attachments: Fansteel Cabot Corporation 104e for email.pdf

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/1/2021 8:01:16 PM
To: kris.durmer@gsa.gov; catherine.crow@gsa.gov
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: Fansteel Metals 104(e) Information Request
Attachments: Fansteel GSA 104e for email.pdf

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
VIA ELECTRONIC MAIL

General Services Administration
Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405
Catherine.crow@gsa.gov

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that General Services Administration (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/1/2021 8:25:36 PM
To: Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: Section 104e Request: Fansteel
Attachments: Fansteel Response .pdf; ExhibitA.pressrelease.pdf; ExhibitB.depotlist.pdf; ExhibitC.Determinations.pdf; ExhibitD.recordstransfer.pdf

The GSA 104e response.

From: Tina Chiappetta - LR <christina.chiappetta@gsa.gov>
Sent: Thursday, February 25, 2021 4:19 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Katharine Healy - LR <katharine.healy@gsa.gov>
Subject: Section 104e Request: Fansteel

Good afternoon,

Attached is GSA's response to your request for information relating to Fansteel Metals.

Please let us know if you have questions.

Thanks,

Tina Chiappetta
Real Property Division
Office of General Counsel
General Services Administration
1800 F Street NW, Room 2019
Washington, DC 20405
Tel.: 202 969 4102
Cell: 202 258 8626

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Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/17/2021 4:00:52 PM
To: Kradin, Ben [Ben.Kradin@osram.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Mr. Kradin,

Your request for a 60 day extension to respond to the 104(e) Request for information for the Fansteel Metals Facility has been approved. Please provide a partial response by April 12, 2021. The final response is now due May 12, 2021. Your cooperation is greatly appreciated.

Thanks
-Lance

From: Kradin, Ben <Ben.Kradin@osram.com>
Sent: Friday, March 12, 2021 5:09 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Dear Ms. Pletan and Mr. Nixon,

OSRAM SYLVANIA is respectfully requesting a 60-day extension for the 104(e) request for information due today. As I mentioned over voicemail, I am currently out on parental leave and this extension would provide sufficient time for OSRAM SYLVANIA to conduct a meaningful search. Thank you for your consideration and please feel free to reach out with questions.

Meanwhile, have a great weekend.

Cheers,

Ben Kradin
CIPP/US, CIPM, FIP
Corporate Counsel
Compliance Officer, USC

OSRAM SYLVANIA INC.
GC AMERICAS
200 Ballardvale Street
Wilmington, MA 01887
Tel.: (978) 570-3077
Cell: (978) 809-6610
ben.kradin@osram.com
www.osram.us

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Amalgamet, Inc.
FKA Amalgamet-Finamines
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Amalgamet, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/16/2021 9:12:19 PM
To: John Hunt [jhunt@amg-nv.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401
Attachments: Metallurg, Inc. - Scan 4.pdf

John,
Please see the attached documents for your review. Please let us know if you need anything else or would like to see more documents. Thank you for your cooperation.
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 3:46 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Re: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Thanks for the update.

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, March 12, 2021 4:44:53 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Hello John,
I apologize about the delay. There was a mix-up on my part. I have the nexus documents ready, however, I have to wait until I get approval to release them to you. Once I get the approval I will send them to you immediately. Again, I'm sorry about the delay.

Thanks
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 7:39 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Have you had an opportunity to access the Nexus documents?

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, March 3, 2021 4:27 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Wednesday, March 3, 2021 1:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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FEB 25 '88 12:24

METALLURG NYC P01

cc: D.G. Istrap
R. Smith

TELEPHONE
(212) 686-4010

CABLE ADDRESS
ALMETORE

METALLURG, INC.
25 EAST 30th STREET
NEW YORK, N.Y. 10016

loc contract
Fax # 3894

February 25, 1988

TELEFAX TO: FANSTEEL/Muskogee, Ok.
Telefax # 918-687-6303

Attn: Mr. Tom Carlile

Re: 50,000 lbs Ta205 in Synthetic Concentrates

Please be advised that we have made shipping arrangements for the above mentioned material, which will be shipped in 4 lots, divided into 5 ocean containers.

Material is expected to leave Antwerp on or about February 24th, ETA Houston March 10th.

Vessel: MV "Sonora"

<u>Contract No.</u>	<u>Drums/Pallets</u>	<u>No.</u>
1) CTIU 423158-5	36 18	1-36
2) CTIU 403468-9	36 18	37-72
3) CTIU 488185-2	36 18	73-108
4) CTIU 402343-1	37 19	109-145
5) IEAU 401237-0	37 19	146-182

<u>Lot No.</u>	<u>Drum No(s).</u>
1	1-58
2	59-117
3	118-162
4	163-182

Kind Regards,
[Signature]
W.H. Miller, Jr.
Contract Admin.

WHM:vff

Inter-Office Correspondence **Fansteel**

TO T. S. Carlile, Jr. FROM J. Hill
cc: R. Smith DATE February 15, 1988
G. Scenter
L. Young SUBJECT Metallurg Tantalite Analysis

FNL LOT	VENDOR CODE	% Ta205	% Cb205	% U308	% Th02
2509	P-10435-04	39.40	32.03	.0706	.399

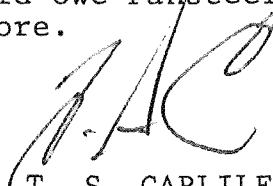
40.55


JIM HILL

JH/bsm

John,

If the Ta content is acceptable to Metallurg, according to Smith's calculations, they still would owe Fansteel 12#. Let's get this concluded, we need the ore.


(T. S. CARLILE, JR.)

DEC 10 '87 15:31

METALLURG NYC P01

TELEPHONE
(212) 686-4010

CABLE ADDRESS
ALMETORE

METALLURG, INC.

25 EAST 90TH STREET
NEW YORK, N.Y. 10016

Fax # 3019

December 10, 1987

TELEFAX TO: Fansteel/Muskogee
Fax # (918) 687-6303

Attn: Mr. Tom Carlile

Re: Conversion Contract C-12212

Dear Tom:

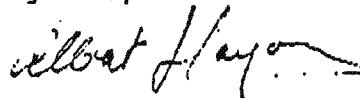
Confirming your telephone call of yesterday, you have accepted the samples of tantalite which we sent to you in October and which are referenced in our telefax 1643 of October 16, 1987.

To complete this order, we owe you 1,754.15 lbs Ta2O5 in tantalite.

We shall promptly send you lot # P-10435-04. The weight of this lot closely approximates the Ta2O5 units due you. If the Ta2O5 units of this lot are greater than 1,754.15 lbs Ta2O5 then Fansteel will supply Metallurg with the corresponding quantity of metallurgical grade powder and Metallurg will pay the corresponding conversion fee. If the Ta2O5 content of this lot is less than 1,754.15 lbs Ta2O5 then Metallurg will pay Fansteel for the difference owed at the rate of \$25.00/lb Ta2O5.

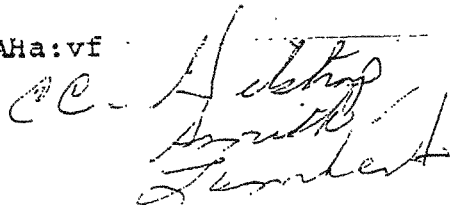
Upon receipt of this lot please let us have your weights and assays.

Regards,



Albert Hayoun
Vice President

AHa:vf





number ten tantalum place muskogee, oklahoma 74401

FAX NUMBER (918) 687-6303 Extension #208

DATE: 2/22/88

TELCOPIER TRANSMITTAL

TO: Dr. Lambert

COMPANY: _____ LOCATION: _____

FROM: L. S. Carile, Jr.

NUMBER OF PAGES: 3 (INCLUDING THIS SHEET)

MESSAGE: _____

NOTE: IF TRANSMISSION IS NOT CLEARLY RECEIVED, PLEASE CALL
AREA CODE 918/687-6303.

Received From METALLURG, INC				Receipt # 58-0981		Order # -NONE-	
Ordered From				Date Received 02/06/88		Packing Slip # C12212	
				No. of Packages and Gross Weight			
				Prepaid YES		Carrier YELLOW FRT	
				Collect Charges		ER or Pro #	
Vendor #		Dept #		Acct #		AFE #	
						Location MUSKOGEE, OK	
Invoice Date							
Due Date						A PACKING SLIP MUST BE INCLUDED WITH ALL SHIPMENTS	
Period #		Tax				<input checked="" type="checkbox"/> NON-TAX <input type="checkbox"/> TAXABLE	

QUANTITY REC'D.	Fansteel Code#	QUANTITY ORD'D.	UNIT	ITEM DESCRIPTION
4,284.600			LB	TANTALITE ORE - TO APPLY TOWARD CONVERSION CONTRACT C12212. METALLURG LOT P-10435-04 FANSTEEL LOT FNL-2509 40 DRUMS FANSTEEL WEIGHED AND SAMPLED EACH DRUM.
***	***	PURCHASE ORDER HAS BEEN COMPLETED		***

Material Checks

Specification Calls For

TO ACCOMPANY MATERIAL

METALLURG CONVERSION ORE RECAP

	DRUM COUNT	GROSS WT	DRUM TARE	NET WEIGHT
TANTALITE ORES	1	115.4	5.6	109.8
METALLURG CONTRACT	1	114.6	4.2	110.4
C-12212	1	114.8	4.2	110.6
FANSTEEL LOT	1	114.8	4.2	110.6
FNL-2509	1	112.8	4.2	108.6
	1	91.0	4.2	86.8
	1	115.4	4.2	111.2
	1	115.4	4.2	111.2
	1	116.2	4.2	112.0
	1	116.6	4.2	112.4
	1	116.4	4.2	112.2
	1	113.0	4.2	108.8
	1	108.4	4.2	104.2
	1	114.6	4.2	110.4
	1	114.0	4.2	109.8
	1	113.0	4.2	108.8
	1	113.8	4.2	109.6
	1	114.8	4.2	110.6
	1	114.6	4.2	110.4
	1	114.6	4.2	110.4
	1	113.0	4.2	108.8
	1	113.2	4.2	109.0
	1	114.4	4.2	110.2
	1	115.0	4.2	110.8
	1	114.4	4.2	110.2
	1	113.6	4.2	109.4
	1	114.2	4.2	110.0
	1	113.6	4.2	109.4
	1	113.8	4.2	109.6
	1	113.8	4.2	109.6
	1	113.4	4.2	109.2
	1	113.0	4.2	108.8
	1	112.8	4.2	108.6
	1	112.8	4.2	108.6
	1	113.4	4.2	109.2
	1	111.8	4.2	107.6
	1	114.6	4.2	110.4
	1	114.8	4.2	110.6
	1	114.6	4.2	110.4
	1	113.6	4.2	109.4
TOTALS:	40	4,538.0	169.4	4,368.6
LESS TARE WT OF EMPTY ORE BAGS:				84.0
TOTAL NET WT:				4,284.6



number ten tantalum place muskogee, oklahoma 74401

December 22, 1987

PURCHASE AGREEMENT

METALLURG, INC. (herein referred to as "Seller") agrees to sell and FANSTEEL INC., with offices at Number Ten Tantalum Place, Muskogee, Oklahoma 74401 (herein referred to as "Buyer") agrees to buy synthetic Tantalite concentrates on the terms and conditions stated herein.

QUANTITY: Approximately Fifty-Thousand (50,000) pounds of Ta_2O_5 contained in synthetic tantalite concentrates.

DESCRIPTION: All material to be dry, in granulated form free of extraneous material and reasonably free-flowing. The concentrates shall conform to the following specifications on a lot-to-lot basis and on an average basis:

	<u>Per Individual Lot</u>	<u>Specification Average for X Lots</u>
Ta_2O_5	23.00% Minimum	23.00 - 25.00%
Nb_2O_5	23.00% Minimum	23.00 - 32.00%
TiO_2	15.00% Maximum	15.00% Maximum
SnO_2	0.30% Maximum	0.30% Maximum
U_3O_8	0.01% Maximum	0.01% Maximum
ThO_2	0.01% Maximum	0.01% Maximum
Sb	50 PPM Maximum	50 PPM Maximum
FeO	8.00% Maximum	8.00% Maximum
SiO_2	15.00% Maximum	15.00% Maximum
CaO	10.00% Maximum	10.00% Maximum
As	100 PPM Maximum	100 PPM Maximum
B	0.01% Maximum	0.01% Maximum
P	0.08% Maximum	0.08% Maximum
Free C	0.10% Maximum	0.10% Maximum
Total C	0.18% Maximum	0.18% Maximum
Moisture	0.01% Maximum	0.01% Maximum
Size	2 MM Down	2 MM Down

PACKAGING: Material to be packaged in clean, open head 200 liter capacity steel drums, complete with lid, retaining ring and closing device (lever lock or bolt and nut). Each drum shall be marked with the lot number, gross weight, tare weight, and net weight of the drum. Seller shall be responsible for labelling all drums or other containers in compliance with all applicable federal, state and local laws, regulations, ordinances or other governmental requirements. Buyer to provide the labelling details. Drums to be palletized two per pallet. Pallets to be two-way entry, sturdy construction, suitable for stacking pallets three high. Pallets to be placed in ocean going containers, suitable for highway transfer. Construction to be so designed to maintain the integrity of the concentrates.

PRICE: Twenty-Five Dollars (\$25.00) per pound of Ta_2O_5 contained. No taxes, freight or other charges shall be applied to increase said price.

DELIVERY: FOB Muskogee, Oklahoma plant during 1st quarter, 1988.

PAYMENT: 100% based on the average of the two analyses as obtained by Buyer and Seller or as otherwise stipulated under the "Sampling and Assaying" clause below. In no event shall payment be required prior to April 1, 1988.

WEIGHING: Weighing to take place at Muskogee, Oklahoma, under the supervision of either Ledoux and Company, A. H. Knight, or another recognized assayer agreed upon by both Buyer and Seller. Seller will have the right to observe the weighing at the Muskogee plant. Any portion of the material rejected by Buyer shall be promptly removed by Seller at its sole cost from Buyer's premises.

SAMPLING & ASSAYING During the weighing operation referred to above, the assayer will sample and prepare 5 representative samples from each lot comprising the total amount sold. These samples

will be sealed by the assayer and two samples each will be provided to Buyer and Seller and one will be retained by the assayer as a "reserve" sample. The cost of this operation will be shared equally between Buyer and Seller.

Buyer and Seller will analyze these samples for the dry net content of Ta_2O_5 and exchange their results by cross mail on a date to be agreed upon. If the difference of the results obtained by Buyer and Seller is within 0.3% Ta_2O_5 , then final settlement will be on the basis of the average of the two analyses.

Should the difference be greater than 0.3% Ta_2O_5 and this difference cannot be resolved by Buyer and Seller, then an independent laboratory/assayer acceptable to both Buyer and Seller would be retained to perform an umpire analysis on the "reserve" sample. In case an umpire analysis is required, the umpire's results will be final for settlement. The cost of the umpire will be paid by the party whose own result was furthest from that of the umpire.

FORCE
MAJEURE:

Neither Seller nor Buyer shall be responsible or liable to the other party for any delay or inability in rendering any performance required by this Agreement directly or indirectly caused by or resulting from strikes, fires, floods, wars, riots, non-availability of transportation facilities, delays of carriers, embargoes, accidents, restrictions, or limitations, or prohibitions imposed by any government or governmental authority or, without limitation, any other cause beyond the reasonable control of the parties whether similar or dissimilar to the causes set forth above, it being understood that neither party shall be excused from its obligations under this Agreement by the aforementioned occurrences unless notice of such occurrences is given by the party affected to the other party within 14 days after the discovery thereof. The occurrence of any such delay or inability in rendering performance shall extend the time required for performance by the party affected to a reasonable time after the cause of delay or inability has been removed; subject, however,

J. H. C.

to the right of the party not affected to cancel its obligations under this Agreement to deliver or receive any material not delivered within 90 days of the due date thereof, owing to such cause, by written notice thereof, given to the other party.

ASSIGNMENT:

This Agreement shall not be assigned in whole or in part by either party without the prior written consent of the other party. This Agreement shall inure to the benefit of and be binding upon the parties, their legal representatives, successors and permitted assigns.

**OTHER TERMS
& CONDITIONS:**

No other or further terms than stated above shall be part of this Agreement.

No modifications of this Agreement or waiver of the terms and conditions thereof shall be binding upon either party unless approved in writing by an authorized representative of such party.

Any controversy or claim arising out of or relating to this Agreement, or the breach thereof, shall be settled by arbitration in Chicago, Illinois, in accordance with the Commercial Arbitration Rules of the American Arbitration Association, and judgment upon the award rendered by the arbitrators may be entered in any court having jurisdiction thereof. The arbitration shall be conducted by one arbitrator unless the party initiating the arbitration shall request three arbitrators in its demand for arbitration. If either party of this Agreement shall fail or refuse to arbitrate or shall institute any action or proceeding to stay or enjoin arbitration hereunder, reimbursement of any legal fees and expenses in any action or proceeding to compel arbitration may be awarded by the arbitrator(s).

The laws of the State of Illinois shall govern this Agreement.

NOTICE:

It shall be a sufficient, but not mandatory, method of giving of any notice or other communication hereunder if the party giving

210

the same shall deposit a copy thereof in the Post Office in a registered or certified envelope, postage prepaid, properly addressed to Seller as follows:

Metallurg, Inc.
25 East 39th Street
New York, New York 10016

Attention: Mr. Albert Hayoun
Vice President

and to Buyer:

Fansteel Inc.
Number Ten Tantalum Place
Muskogee, Oklahoma 74401

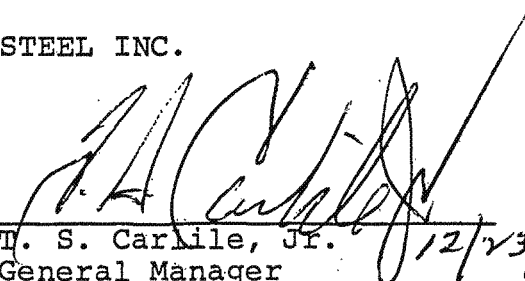
Attention: General Manager

or at such other address as a party shall hereafter in writing designate. The date of giving any such notice or other communication shall be the date on which such envelope was deposited as above provided. The Post Office receipt showing the date of such deposit shall be prima facie evidence of these facts.

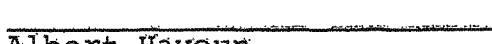
FANSTEEL INC.

METALLURG, INC.

By:


T. S. Carlisle, Jr.
General Manager
Metals Group Muskogee

By:


Albert Hayoun
Vice President

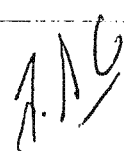
Date: _____

Date: _____

By:

K. R. Garrity, Chairman
and Chief Executive Officer

Date: _____



Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/15/2021 8:38:17 PM
To: Webster, Susan [webster.susan@epa.gov]
CC: Johnson, Lydia [johnson.lydia@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Hi Susan,

OSRAM Sylvania has requested a **60 day extension** to respond to the 104e for Fansteel. If approved, this would make a **partial response due on April 12, 2021**, and the **final response due on May 12, 2021**.

From: Kradin, Ben <Ben.Kradin@osram.com>
Sent: Friday, March 12, 2021 5:09 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Dear Ms. Pletan and Mr. Nixon,

OSRAM SYLVANIA is respectfully requesting a 60-day extension for the 104(e) request for information due today. As I mentioned over voicemail, I am currently out on parental leave and this extension would provide sufficient time for OSRAM SYLVANIA to conduct a meaningful search. Thank you for your consideration and please feel free to reach out with questions.

Meanwhile, have a great weekend.

Cheers,

Ben Kradin
CIPP/US, CIPM, FIP
Corporate Counsel
Compliance Officer, USC

OSRAM SYLVANIA INC.
GC AMERICAS
200 Ballardvale Street
Wilmington, MA 01887
Tel.: (978) 570-3077
Cell: (978) 809-6610
ben.kradin@osram.com
www.osram.us

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Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/1/2021 4:49:35 PM
To: Gerry Caron [gerry.caron@cabotcorp.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.
Attachments: Fansteel - Cabot 104e Extension Letter.pdf

Hello Gerry,

The approval letter dated February 23, 2021, extending the response for Cabot Corp. is attached.
Thank you for your cooperation.

Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Friday, February 5, 2021 8:43 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance. Much appreciated. I will reach out to you if other questions come up during our review.

Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, February 5, 2021 9:03 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Good morning,

Your request for an extension has been approved. I'll send you a signed approval letter by email hopefully next week.

-Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 5:16 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Thursday, February 4, 2021 4:32 PM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
I have submitted your request for an extension to my management. I'll be in touch as soon as hear back.
Thank you for your cooperation.

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, by cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

Gerry Caron
Cabot Corporation
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210
Gerry.caron@cabotcorp.com

Re: Request for Information for the Fansteel/FMRI Superfund Site

Dear Mr. Caron:

On February 4, 2021, the U.S. Environmental Protection Agency (EPA) received your request on behalf of Cabot Corporation for a 30-day extension to respond to the Fansteel/FMRI Site 104(e) Information Request. Cabot Corporation received the 104(e) Information Request on February 2, 2021.

Based on the EPA's review of your request, we are extending the deadline for your response by 30 days. As a result, your response to the 104(e) Information Request is now due no later than April 5, 2021. Should you have any questions, please contact Mr. Lance Nixon at (214) 665-2203 or nixon.lance@epa.gov. Thank you for your attention to this matter.

Sincerely,

SUSAN

WEBSTER

Susan D. Webster, Chief

Assessment & Enforcement Branch (SEDA)
Superfund Division

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection
Agency, cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=680010
03655400
Date: 2021.02.23 16:05:24 -06'00'

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/12/2021 9:44:53 PM
To: John Hunt [jhunt@amg-nv.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Hello John,

I apologize about the delay. There was a mix-up on my part. I have the nexus documents ready, however, I have to wait until I get approval to release them to you. Once I get the approval I will send them to you immediately. Again, I'm sorry about the delay.

Thanks
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 7:39 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Have you had an opportunity to access the Nexus documents?

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, March 3, 2021 4:27 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Wednesday, March 3, 2021 1:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office

has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/12/2021 2:48:24 PM
To: Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: Kennametal Response to Fansteel Metals CERCLA 104(e) Information Request
Attachments: Kennametal Response to USEPA Fansteel CERCLA Info Request(3.12.21).pdf

FYI

From: Seth Rice <seth.rice@kennametal.com>
Sent: Friday, March 12, 2021 7:16 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: Kennametal Response to Fansteel Metals CERCLA 104(e) Information Request

Mr. Nixon:

Attached please find Kennametal Inc.'s response to U.S. EPA's CERCLA 104(e) information request regarding the Fansteel Metals site in Muskogee, Oklahoma. Per my prior correspondence, Kennametal is providing relevant documents in electronic format. The files are bates stamped and referenced accordingly in our response letter. You can download the files from the following Dropbox link (please let me know if you have any issues accessing the link):

<https://www.dropbox.com/sh/4j5eyxdhgwfn015/AACXkv8Q8AON24nQ5Zk1UuGBa?dl=0>

Best regards,
Seth

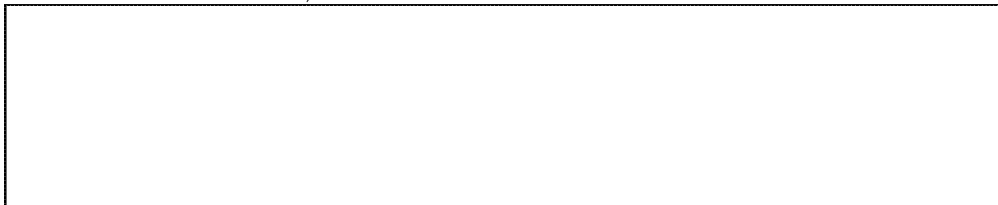
Seth A. Rice

Assistant General Counsel
Global Director of Ethics & Compliance; CCEP
seth.rice@kennametal.com

T +1 412 248 8210
M +1 412 841 2918
F +1 724 539 3839
Ethics Helpline: 1-877-781-7319

Kennametal Inc. | 525 William Penn Place Suite 3300 | Pittsburgh, PA 15219 | www.kennametal.com

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March 12, 2021

VIA E-MAIL

Mr. Lance M. Nixon (nixon.lance@epa.gov)
Enforcement Officer
United States Environmental Protection Agency
Region 6
1201 Elm Street
Suite 500
Dallas, TX 75270

Re: CERCLA 104(e) Information Request for
Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Mr. Nixon:

On behalf of Kennametal Inc. ("Kennametal"), I am submitting the enclosed responses to the United States Environmental Protection Agency Region 6's Request for Information dated January 22, 2021, that Kennametal received on February 17, 2021. The information provided in the enclosed responses is based on a diligent review of information and records in the possession, custody, and control of Kennametal.

As instructed by EPA, Kennametal is submitting this response electronically via email with a file sharing link to the relevant documents, as per my previous correspondence with EPA counsel Elizabeth Pletan. For ease of reference, Kennametal has bates stamped the documents using the format KMTL-00001. The narrative responses follow below, subject to and incorporating the objections stated therein.

Kennametal reserves the right to supplement its responses should additional information or documents be located. If you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Seth A. Rice', written over a horizontal line.

Seth A. Rice

Attachment: Response to USEPA CERCLA 104(e) Fansteel Metals Facility Information Request

**Kennametal Inc.'s Response to the
United States Environmental Protection Agency's CERCLA 104(e)
Information Request Regarding the
Fansteel Metals Facility
March 12, 2021**

After a diligent search, Kennametal provides its responses below, subject to the following objections:

1. Kennametal's responses to the Request are made to the best of Kennametal's present knowledge, are based upon information currently known and documents currently in Kennametal's records, and are given without prejudice to change, supplement and/or clarify, if necessary.
2. Kennametal's responses are made subject to and without in any way waiving or intending to waive, any objection as to the competency, relevancy, materiality, privilege, or admissibility as evidence for any purpose for any of the documents and information provided by Kennametal in its responses.
3. Kennametal objects to the Request on the grounds and to the extent that the Request seeks to impose upon Kennametal obligations relating to the identification and disclosure of confidential information that are different from, other than, or in addition to, those obligations set forth in 40 C.F.R., Part 2 and CERCLA Section 104(e)(7).
4. Kennametal objects to the Request on the grounds that it implies or infers responsibility with respect to hazardous substances that is different from, or broader than, that imposed by Section 107 of CERCLA, 42 U.S.C. §9607, or Section 7003 of RCRA, 42 U.S.C. §6873.
5. Kennametal objects to the Request on the grounds and to the extent that it seeks to impose upon Kennametal obligations relating to the investigation for, disclosure of, descriptions and representations concerning any information responsive to the Request that are different from, other than, or in addition to Section 104 of CERCLA, 42 U.S.C. §9604, or Section 3007 of RCRA, 42 U.S.C. §6972.
6. Kennametal objects to the Request on the grounds and to the extent it attempts to impose upon Kennametal obligations contrary to the provisions of Article III of the United States Constitution and Title 28 of the United States Code.

USEPA CERCLA 104(e) REQUESTS:

1. Please provide the full legal name, mailing address, and phone number of the Respondent.

RESPONSE:

Kennametal Inc.
525 William Penn Place
Suite 3300
Pittsburgh, Pennsylvania 15219
Main phone: (724) 539-7641

2. For each person answering these questions on behalf of the Respondent, provide full name, title, business address, and business telephone and fax number.

RESPONSE:

Seth A. Rice
Assistant General Counsel
Global Director of Ethics & Compliance; CCEP
525 William Penn Place
Suite 3300
Pittsburgh, Pennsylvania 15219
Office Phone: (412) 248-8210 (**due to pandemic office closures, please use email*)
Fax: (724) 539-3839
seth.rice@kennametal.com

3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.

RESPONSE:

CT Corporation System
c/o Kennametal Inc.
1999 Bryan Street, Suite 900
Dallas, Texas 75201
Phone: (214) 979-1172
Candace.dunhoff@wolterskluwer.com

4. Please explain the business relationship between Respondent and Fansteel Metals.

RESPONSE: Following a diligent review of records and interviews with Kennametal employees, Kennametal has no detailed information about the business relationship between Kennametal and Fansteel Metals, which appears to have ended by 1983. In short, Kennametal was a customer of Fansteel Metals.

Based on the available records, it appears that Fansteel Metals could provide various technical services related to the conversion of materials, such as Tantalum Oxide (Ta_2O_5) and TA Anodized Anodes, as described further in response to Questions 5 and 6 below. See KMTL-00001 to 00019. These two limited transactions between Kennametal and Fansteel Metals in 1979 and 1983 were related to the conversion of valuable materials. Neither involved the transfer or disposal of waste by Kennametal. As described below and in the attached documents, the records related to these limited transactions are scarce.

Kennametal is also providing documents that are not responsive to the information requests because they are not related to materials sent to Fansteel Metals by Kennametal. The documents labeled KMTL-00024 to 00405 are related to a series of transactions in 1963-1964 regarding Fansteel Metal's conversion of surplus tin slag owned by the United States government.

Based on our review of this record, the government's tin slag was not a waste; it was surplus material in its inventory. Kennametal's role in this transaction was to submit a purchase order for the converted materials after processing by Fansteel Metals. See KMTL-00044; KMTL-00070 to 00074. See also KMTL-00075 at 00105 to 00106 for a record of shipments made by Fansteel to Kennametal. It also appears that Kennametal was a customer separately purchasing valuable materials from Fansteel Metals in 1963. See KMTL-00075 for an example of such an order.

Kennametal assumes that the USEPA is already in possession of these records but is providing them and the following descriptions of these transactions to assist in USEPA's review.

- a. Type and purpose of the transaction – According to available records, the purpose of the transaction was for Fansteel Metals to convert U.S. government owned surplus tin slag to produce tantalum oxide (Ta_2O_5) and columbium oxide (Cb_2O_5) for the Government Services Administration (GSA). See KMTL-00026. See also KMTL-00026 at 00029 to 00030 for purity specifications for the produced material. Some processing details are provided in a Fansteel Metals internal memo, KMTL-00107 at 0131. These conversion activities were arranged entirely between Fansteel Metals and the U.S. government.
- b. Description of materials – Upon delivery of the tin slag to Fansteel Metals by GSA, the material was weighed and sampled by Fansteel with a GSA representative present. See KMTL-00021-00025; KMTL-00026 at 00027; KMTL-00050 at 00057; and KMTL-00107 at 00123. See also KMTL-00026 for details of the initial contract quantities of government material to be sent to Fansteel Metals from the government depot in Wardwell, OH. KMTL-00046-00047 provides tally sheets for the weight of each drum sent by GSA from the government's Wardwell, OH depot. KMTL-00048-00049 provides the tally sheets for the weight of each drum sent to Fansteel Metals by GSA from its Romulus, New York depot.

Materials subsequently shipped to Kennametal were analyzed by Fansteel Metals before shipment. See for example KMTL-00264 to 00275; KMTL-00319 to 00404. Materials received by Kennametal from Fansteel Metals were also analyzed in various Reports of Assay. See for example KMTL-00081 to 00086. Numerous discussions took place over time regarding the quality of the material shipped to Kennametal. KMTL-00141 to 00175.

- c. According to the documents, the amounts paid to Fansteel were based on price per pound of tantalum oxide \$3.42 /lb and columbium oxide, \$1.48 /lb. KMTL-00030.
- d. Dates – The earliest records include correspondence between Kennametal and Fansteel Metals in May through June of 1963 at which time Fansteel developed a proposal to convert the U.S. government's tin slag. KMTL-00107. As the parties considered the project for GSA, some materials were shipped to Kennametal for review. KMTL-00107 at 00109 to 00113; KMTL-00237; KMTL-00239. See also KMTL-00070 to 00074 for Fansteel Metals internal memos about the purchase order contract under which Fansteel Metals would send materials to Kennametal.

GSA transported tin slag from two U.S. government depot locations to Fansteel Metals on two dates:

- 1) 87 drums from Warren Depot, Wardwell, Ohio on July 22, 1963, KMTL-00022; KMTL-00107 at 00124-0016; and
- 2) 100 drums from the Seneca Army Depot, Romulus, New York on September 3, 1963. KMTL-00020.

See also a summary of shipments and receipts, KMTL-00107 at 00119 to 00121.

According to available correspondence, the last shipment of columbium oxide from Fansteel Metals to Kennametal was made on March 17, 1964. KMTL-00075 at 000105; KMTL-00203 at 00225 to 00232. Shipments of other materials had been completed by December 26, 1963. See KMTL-00176 at 00181 to 00185 for the status of deliveries to Kennametal as of November 7, 1963; and KMLT-00203 to 00206 for the status of deliveries to Kennametal as of December 26, 1963. Various shipping notices are provided in KMTL-00247 to 00263.

During the 1963-1964 transactions, Kennametal did not ship materials to Fansteel Metals other than the following, neither of which involved waste:

- 1) return of a non-conforming lot and related samples in November 1963, KMTL-00075 at 00098 and 00100; KMTL-00176 at 00194; and
- 2) a sample in February 1964 to demonstrate contamination in materials provided by Fansteel to Kennametal. KMTL-00075 at 00102; KMTL-00203 at 00234.

- e. Transportation of the government owned tin slag to Fansteel Metals from Warren Ohio was provided by Indiana Valley Railroad Company. KMTL-00051. Transportation of the government owned tin slag from Romulus New York was provided by Lehigh Valley Railroad Company. KMTL-0067-00069.
- f. Facilities from which materials were sent included two government depots – one in Wardwell, Ohio and one in Romulus, New York. See above.
- g. Ownership of the tin slag remained in the GSA from beginning to end of the transactions, in transport to and from Fansteel Metals, and on location at Fansteel Metals. KMTL-00026 at 00027 and KMTL-00050 at 00067. Fansteel referred to its receipt of the material as a “consignment.” KMTL-00107 at 00129.

Under the terms of the contract with Fansteel Metals, title and ownership of the containers transferred to Fansteel when the containers were emptied. KMTL-00022 to 00023; KMTL-00026 at 00027; and KMTL-00107 at 00118. Ownership of residuals resulting from the conversion of the government’s tin slag remained with Fansteel. *Id.* Nothing in the available record indicates that the residuals were waste. The value of the residuals and containers was considered in the contracted price for processing the government owned tin slag. KMTL-00031.

As can be seen from this record, this series of documents is not responsive to the USEPA’s CERCLA 104(e) request for information directed to Kennametal. According to the record, Kennametal did not send any material to Fansteel Metals in this time period other than a few samples to demonstrate that the specifications of the purchase order contract had not been met, and the return of a nonconforming order.

- 5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the Respondent for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, logbook entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:

- a. The type and purpose of the transaction;

RESPONSE: Kennametal reviewed its records and located a limited number of documents summarizing a shipment of valuable materials to Fansteel for conversion to other valuable materials. Refer to documents labeled KMTL-00001-00019.

- b. A description of the materials involved, including their quantity and chemical content and characteristics;

RESPONSE: Provided below are references to the relevant documents, and the materials and quantities of materials sent by Kennametal to Fansteel Metals.

- KMTL-00001 to 00002: TAO, 4,000 pounds.
- KMTL-00003 to 00006: Tantalum Oxide, 4,000 pounds; Tantalum Carbide, 3,400 pounds.
- KMTL-00007: TA205, 4,000 pounds; 3,400 pounds, TAC.
- KMTL-00008 to 00009: TA Oxide, 4,000 pounds
- KMTL-00010 to 00011: Tantalum Oxide, 4,000 pounds.
- KMTL-00012 to 00014: TA Anodized Anodes, 2,014 pounds.
- KMTL-00015 to 00019: TA Anodized Anodes, 2,002.5 pounds.

- c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;

RESPONSE: Based on a review of Kennametal records, Kennametal has no information regarding steps taken to determine whether the materials contained hazardous substances at the time of each transactions. Regarding transportation of valuable materials to Fansteel, the documents identified in Kennametal's response to Question 5.b indicate such materials were shipped in drums.

- d. Any amounts paid by or to Respondent in connection with each transaction;

RESPONSE: Some of the documents identified in Kennametal's response to Question 5.b indicate that Fansteel charged Kennametal for converting and/or shipping the valuable materials shipped to Fansteel for conversion. For example, documents KMTL-00008 to 00009 (Fansteel Shipping Notices), indicate a total charge of \$16,660.00 to Kennametal for 3,400 pounds of TAC (converted from 4,000 pounds of TA Oxide). Other documents from those labeled KMTL-00001-00019 contain fewer or no financial details. These documents do not show actual payments by or to Kennametal.

- e. The date of each transaction;

RESPONSE: See Kennametal's response to Question 5.f for transaction-related dates.

- f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;

RESPONSE: The documents below appear to show dates regarding transportation of materials to the Site or to Kennametal.

- August 27, 9 (apparent clerical error) (KMTL-00003 to 00004): Site received 4,000 pounds of Tantalum Oxide from Kennametal.
 - September 1979 (KMTL-00005): Site shipped 3,400 pounds of Tantalum Carbide to Kennametal.
- Undated (KMTL-00007): Received 4,000 pounds TA205;

- Shipped 3,400 pounds TAC to Kennametal.
 - October 29, 1979 and November 28, 1979 (KMTL-00008 to 00009): Fansteel shipped to Kennametal a total of 3,400 pounds of TAC.
 - October 2, 1979 (KMTL-00010): Site received 4,000 pounds of Tantalum Oxide from Kennametal.
 - December 15, 1983 (KMTL-00012): Site received 2,014 pounds of TA Anodized Anodes from Kennametal.
 - December 6, 1983 (KMTL-00014): Kennametal shipped 2,014 pounds of TA Anodized Anodes to Site.
 - August 6, 1983 (KMTL-00015 to 00016): Site received 2,002.5 pounds of TA Anodized Anodes from Kennametal.
 - July 25/27, 1983 (KMTL-00017 to 00018): Kennametal shipped 2,002.5 pounds of tantalum anodized anodes to Site.
- g. The name(s) and address(es) of any entities providing transportation services for such materials;

RESPONSE: The included documents labeled KMTL-00001 to 00019 identify the following entities related to transportation services as part of the transactions:

- Leeway
 - Continental Air Freight
 - Interstate
 - Consolidated Freightways (also listed as Con*dated Fgt, Consolid*d Fgt, and CF); P.O. Box 4488, Portland Oregon 97208.
- h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and

RESPONSE: The included documents labeled KMTL-00001 to 00019 identify the following Kennametal facilities from which the valuable materials were sent to the Site:

Kennametal, Inc., Pittsburgh PA 15205
Kennametal, Inc., Latrobe, PA

The nature and scope of operations at the above facilities is unknown due to the passage of time and lack of available information.

- i. If ownership of material changed at any point as a result of the transaction.

RESPONSE: Based on a review of Kennametal records, Kennametal has no information regarding whether ownership of the valuable materials changed during the transactions identified in the documents labeled KMTL-00001 to 00019.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:

- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?

RESPONSE: A review of Kennametal records yielded no information indicating that Kennametal employees or other representatives visited the Site. As such, Kennametal has identified no information regarding activities and/or business practices at the Site.

- b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.

RESPONSE: Please refer to Kennametal's response to Question 6.a.

- c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?

RESPONSE: Based on a review of Kennametal records, there is nothing to indicate that Kennametal was aware that hazardous substances were disposed at the Site during those times that Kennametal transacted with Fansteel Metals or any other time.

- d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?

RESPONSE: A review of Kennametal records yielded no information indicating that Kennametal had any influence over waste disposal activities at the Site.

- e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?

RESPONSE: A review of Kennametal records yielded no information to demonstrate Kennametal's knowledge whether the owner(s)/operator(s) of the Site were or were not removing a hazardous substance from transferred materials.

- f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?

RESPONSE: A review of Kennametal records yielded no information demonstrating Kennametal's knowledge (based on general industry knowledge or otherwise) of whether hazardous substances would need to be removed from transferred materials for the material to be useful.

- g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.

RESPONSE: A review of Kennametal records yielded no information regarding discussions and/or planning regarding hazardous substances in transferred materials. The record contains no indication of an intent to dispose of hazardous substances at the Site.

- h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

RESPONSE: Based on a review of Kennametal records, Kennametal is not aware of the measures it took to determine the actual means of treatment, disposal, or other uses of hazardous substances at the Site and has not identified information regarding treatment and disposal practices at the Site. Likewise, reviewed records do not provide any information that the Site's owner(s)/operator(s) provided any assurances to Kennametal regarding handling and ultimate disposition of any hazardous substances at the Site.

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/5/2021 2:03:04 PM
To: Gerry Caron [gerry.caron@cabotcorp.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Good morning,

Your request for an extension has been approved. I'll send you a signed approval letter by email hopefully next week.

-Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 5:16 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Thursday, February 4, 2021 4:32 PM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,

I have submitted your request for an extension to my management. I'll be in touch as soon as hear back.
Thank you for your cooperation.

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,

Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon
Enforcement Officer

U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/26/2021 2:16:42 PM
To: Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: Section 104e Request: Fansteel
Attachments: Fansteel Response .pdf; ExhibitA.pressrelease.pdf; ExhibitB.depotlist.pdf; ExhibitC.Determinations.pdf; ExhibitD.recordstransfer.pdf

GSA's 104e response.

From: Tina Chiappetta - LR <christina.chiappetta@gsa.gov>
Sent: Thursday, February 25, 2021 4:19 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Katharine Healy - LR <katharine.healy@gsa.gov>
Subject: Section 104e Request: Fansteel

Good afternoon,

Attached is GSA's response to your request for information relating to Fansteel Metals.

Please let us know if you have questions.

Thanks,

Tina Chiappetta
Real Property Division
Office of General Counsel
General Services Administration
1800 F Street NW, Room 2019
Washington, DC 20405
Tel.: 202 969 4102
Cell: 202 258 8626

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Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/3/2021 9:30:29 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401
Attachments: EPA Fansteel 030321.pdf

The attached letter is from Metallurg. I spoke with John Hunt earlier today. I will look for nexus documents for them as well.

From: John Hunt <jhunt@amg-nv.com>
Sent: Wednesday, March 3, 2021 1:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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Metallurg, Inc.

Via Email To: Nixon.lance@epa.gov

March 3, 2021

Mr. Lance Nixon
United States Environmental Protection Agency
Region 6
1201 Elm Street
Suite 500
Dallas, Texas 75270

RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Mr. Nixon,

I am in receipt of the following CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087:

Certified Mail, Return Receipt #7020 0640
0000 9754 2334
GFE Conversion
Metallurg, Inc
Heinz Schimmelbusch, CEO
435 Devon Park Drive, Suite 200
Wayne, PA 19087

Certified Mail, Return Receipt #7020 0640
0000 9754 2389
The Corporation Trust Company for
Metallurg, inc
1209 Orange Street
Wilmington, Delaware 19801

Due to COVID-19 restrictions our office is currently closed with limited access. The information request letters were placed on my desk however I have not been in my office in the past two months. The letters have sat idle on my desk until I visited my office this week.

We are reviewing the 104(e) Information Request, including the Questions identified within Enclosure 3. We will provide our response by April 9, 2021.

Please let me know if you have any questions. I can be reached at (617) 957-5961.

Regards,

John Hunt
Director of Environmental Projects

435 Devon Park Drive, 200 Building, Wayne, PA 19087

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 3/3/2021 9:26:43 PM
To: John Hunt [jhunt@amg-nv.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Wednesday, March 3, 2021 1:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

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Regards,
John

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Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/4/2021 9:32:21 PM
To: Gerry Caron [gerry.caron@cabotcorp.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
I have submitted your request for an extension to my management. I'll be in touch as soon as hear back.
Thank you for your cooperation.

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.Elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/4/2021 9:04:33 PM
To: Webster, Susan [webster.susan@epa.gov]
CC: Johnson, Lydia [johnson.lydia@epa.gov]; Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Susan,

Cabot Corporation, a recipient of a 104e for Fansteel, has requested a 30 day extension to respond to the request. Your approval of this request will make the response do April 5, 2021. If you approve, I will draft an extension letter for your signature.

Thanks

-Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,

Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM

To: Nixon, Lance <Nixon.Lance@epa.gov>

Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

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Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>

Sent: Monday, February 1, 2021 3:23 PM

To: Karen Kalita <Karen.Kalita@cabotcorp.com>

Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer

U.S. Environmental Protection Agency

Superfund and Emergency Management Division

Assessment and Enforcement Branch

214-665-2203

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FAX MEMO TO: BILL SHEUBROOKS
CABOT CORPORATION
FAX #215/367-2182, EXT FAX

1/15/87

BILL: PER OUR PHONE CONVERSATION THIS AM, FOLLOWING IS THE
DETAIL ON THE ORES/CONCENTRATES BEING SHIPPED TO YOU PER THE
"SWAP" AGREEMENT:

DRUM COUNT	FANSTEEL LOT NO.	ORIGINAL LOT NO.	NET WET WEIGHT (POUNDS)
69	1 (2299)	2543	30,726
31	2 (2333)	T15T021	13,625
5	3 (2338)	T-4	2,236
5	4 (2340)	T-6	2,211
100	5 (2434)	T-82	10,990
13	6 (2448)	4	5,729
7	7 (2449)	13751	3,074
14	8 (2466)	5/18YELLOW	20,010
<u>90</u>	9 (2480)	16197	<u>39,682</u>
334	TOTAL		128,283

AND, TO RECAP THE INFORMATION YOU REPORTED TO ME VERBALLY,
THE THAI SLAGS LOTS SHIPPING TO MUSKOGEE ARE:

DRUM COUNT	CABOT LOT NO.	BILLITON LOT NO.	NET WET WEIGHT (POUNDS)
120	2429	592	117,743
120	2444	588	111,957
120	2515	654	110,930
<u>120</u>	2520	661	<u>110,784</u>
480	TOTAL		451,414

BILL, AS WE DISCUSSED, THESE ARE APPROXIMATE TOTALS, AND
WILL BE FIRMED UP AS WE SHIP. PLEASE LET ME KNOW IF YOU
REQUIRE FURTHER INFORMATION.

REGARDS,

DONNA GILSTRAP
(918) 687-6303

3-7-88
Knight Labs - Ken McKenna / Out
Send up sealed sample of FNL Mat'l
in Knight Labs. Let me know
when analysis will be done.

Inter-Office Correspondence



THAI
SLAGS
28

TO R. H. Ford FROM K. R. Garrity
cc: J. H. Devlin DATE July 13, 1972
S. W. Lindroth
G. L. Brown SUBJECT Thai Slags

On July 11th I received a phone call from G. Brown and Graham informed me he was currently located on the 42nd floor of the Union Carbide Building and expected to remain there for at least 4-6 weeks. He will then move to the offices of the Billiton Trading Company.

Graham advised that he had met with Stearn and Epremian the previous day and received a very cool reception. Both Stearn and Epremian were unhappy with the decision to transfer all selling responsibility for Thai slags to Billiton/Union Carbide joint venture. Although we have not officially been notified, I expect further negotiations, analytical and packaging problems, weight discrepancies, etc. to be handled by the joint venture company and not the Metals & Mining Div. of Union Carbide.

Graham would like to meet with us in early August and review our current contract. He suggested New York, however, I'd be more inclined to meet in Chicago unless you have plans to discuss tungsten with Rawlings and we could combine the discussions on the same day. I will continue negotiations on the phone with Graham, however, I am of the opinion that we should wait to meet with Graham until we are told by Mining & Metals that responsibility has been transferred to Billiton. We should not jeopardize our relationship with Stearns in any way in view of the tungsten situation and our sales to Kemet.

Graham talked about new methods of packaging and wanted to arrange a meeting in Muskogee with a Mr. Roymas (Packaging engineer for joint company) to discuss our packaging problems and see our material handling facility. I am not prepared to have men from Billiton walk through our facility and would not want to do this until after we have had a meeting and thorough understanding with Graham. If I read Graham correctly, they want to start shipping from Phuket as soon as possible and are looking for different ways to transport material. I get the feeling they would like to ship in bulk and not in drums. We would not be against shipping in bulk providing;

1. Weight is determined at Port of Muskogee
2. Sampling at Muskogee

Inter-Office Correspondence *FANSTEEL INC.*

TO R. H. Ford FROM K. R. Garrity
Page -2- DATE July 13, 1972
SUBJECT Thai Slags

3. Reduction in price to compensate for our having to purchase containers
4. Consigned stock in Muskogee

The material in Thailand is currently in a pile under canvas-cover. It has not been packaged nor analyzed. With our discrepancies in analysis on the recent receipts it becomes more important that adequate sampling is performed and that a new correlated analytical procedure agreed to between Fansteel and Billiton.

With your concurrence and if we receive notification from Stearns, I will try to set-up a meeting in Chicago with Graham either 8/8 or 8/9.


Keith R. Garrity

ds

This Agreement, made and entered into this 12th day of August, 1969, by and between

UNION CARBIDE CORPORATION, a corporation organized and existing under the laws of the State of New York (hereinafter referred to as "Union Carbide")

and

PANSTEEL, INC., a corporation organized and existing under the laws of the State of New York (hereinafter referred to as "Fansteel")

W I T N E S S E T H: That

In consideration of the mutual covenants herein contained, the parties hereto have covenanted and agreed and by these presents do covenant and agree as follows:

ARTICLE I

PURCHASE BY UNION CARBIDE OF
CAPACITOR GRADE TANTALUM POWDER

Section 1. Fansteel shall sell and deliver to Union Carbide, and Union Carbide shall purchase and accept from Fansteel, FD grade, FG grade and FC-18 grade tantalum powder in the amounts and subject to the terms and conditions set forth in this Agreement. The term of this Agreement shall commence as of the date hereof, and shall continue through December 31, 1971. Union Carbide agrees to purchase not less than 70% of its requirements of capacitor grade tantalum powder during the period from January 1, 1970, through December 31, 1971, (but not including use of powder inventories on hand as of January 1, 1970) from Fansteel, and Fansteel agrees to supply the same to Union Carbide, pursuant to the terms hereof.

All the terms and conditions of this Agreement shall apply to any powder purchased by Union Carbide from Fansteel during 1969 from the date hereof; however, only powder purchased in 1969 after the date hereof in excess of an aggregate of 10,000 pounds will apply against Union Carbide's 70% commitment for 1970. All of such FD grade and FC-18 grade powder to be sold and delivered to Union Carbide hereunder shall meet the specifications for such powders set forth respectively in Exhibits A and C attached hereto and made a part hereof by reference. The specifications for FG grade powder are to be added hereto as Exhibit B upon agreement between the parties. If no agreement as to such specifications occurs prior to December 1, 1969, then this Agreement shall have no force and effect and neither Union Carbide nor Fansteel shall have any further obligations hereunder except as to powder purchased by Union Carbide from Fansteel prior to such date. Additional grades of tantalum powder may be added by agreement of the parties with specifications and prices to be agreed upon.

If Union Carbide gives notice of its powder requirements as provided in Article IV, Section 2, and Fansteel fails to deliver such materials to specification during the subsequent calendar quarter, then the quantity of material not delivered may be obtained by Union Carbide from other sources, and such material shall be credited against Union Carbide's 70% purchase commitment under this Section.

Section 2. As consideration for the sale by Fansteel to Union Carbide of such capacitor grade powder,

Union Carbide shall:

(a) Pay to Fansteel in cash the following amounts per pound of tantalum powder delivered:

- (i) \$9.16 per pound of FD grade tantalum powder
- (ii) \$6.10 per pound of FG grade tantalum powder
- (iii) \$8.50 per pound of FC-18 grade tantalum powder

(b) Deliver to Fansteel 1.3 pounds of tantalum contained in tantalum oxide (Ta_2O_5) meeting the specifications set forth in Exhibit D attached hereto and made a part hereof by reference, for each pound of tantalum powder purchased by Union Carbide hereunder.

Section 3. Notwithstanding the requirement of the foregoing Section 2(b) that the Ta_2O_5 to be delivered to Fansteel shall meet the specifications set forth in Exhibit D, Union Carbide shall consign to Fansteel 24 lots of Ta_2O_5 consisting of an aggregate of 54,378 pounds of Ta_2O_5 and with a chemical analysis as listed in Exhibit I attached hereto, which do not meet the aforesaid specifications of Exhibit D. Such lots are consigned for the purpose of satisfying in part Union Carbide's obligations pursuant to the foregoing Section 2(b) and Article II, Section 1. Fansteel shall withdraw one pound of such out-of-specification material for each pound of Ta_2O_5 shipped to Fansteel pursuant to Section 2(b) meeting said specifications, and shall apply such out-of-specification material to Union Carbide's

obligations under Section 2(b). In addition, Fansteel shall have the right to make advance withdrawals of such material at any time and from time to time, such withdrawals to be applied against Union Carbide's obligations pursuant to Section 2(b). Whenever Fansteel withdraws any of such consigned out-of-specification Ta_2O_5 pursuant to the provisions of this paragraph, it shall promptly advise Union Carbide ✓ in writing of the lot number and amount of Ta_2O_5 so withdrawn.

ARTICLE II

PURCHASE BY FANSTEEL OF Ta_2O_5 OR TANTALUM SLAGS

Section 1. For each pound of capacitor grade tantalum powder sold and delivered by Fansteel to Union Carbide pursuant to the provisions of Article I hereof during the term of this Agreement and to the extent Fansteel has requirements for tantalum contained in Ta_2O_5 (exclusive of inventories on hand as of January 1, 1970), Fansteel agrees to purchase or have processed one pound of tantalum contained in Ta_2O_5 from Union Carbide in one or both of the following optional ways:

(a) By purchasing Ta_2O_5 processed from raw materials owned by Union Carbide at the price of \$9.75 per pound of Ta_2O_5 .

(b) By having Ta_2O_5 extracted by Union Carbide from raw materials supplied by Fansteel at a price of \$2.50 per pound of Ta_2O_5 delivered. The raw materials to be supplied by Fansteel to Union Carbide

for this purpose shall be natural ores containing 38% plus or minus 3% Ta_2O_5 and 28% plus or minus 2% of Cb_2O_5 . Union Carbide shall be obligated to deliver to Fansteel all Ta_2O_5 and Cb_2O_5 extracted from such ores but in no case less than the following yields with respect to such materials:

Ta_2O_5	90%
Cb_2O_5	85%

The Ta_2O_5 and the Cb_2O_5 to be delivered to Fansteel by Union Carbide hereunder shall meet the specifications for Ta_2O_5 and Cb_2O_5 set forth in Exhibits D and E respectively attached hereto and made a part hereof by reference, except to the extent that the Ta_2O_5 referred to in Article I, Section 3 hereof may be applied in satisfaction of Option (a) above.

Fansteel is presently obligated to deliver to Union Carbide 72,922 pounds of Cb_2O_5 as detailed in Exhibit F attached hereto. The parties agree that Fansteel shall have the option not to deliver such material and to credit such material against Union Carbide's obligation to deliver Cb_2O_5 to Fansteel pursuant to the provisions of Paragraph (b) of this Section; provided, however, that in such event Fansteel agrees to have sufficient amounts of natural ores processed by Union Carbide pursuant to such Paragraph (b) during the term of this Agreement or for advance delivery under the provisions of Section 2 of this Article II to yield sufficient amounts of Cb_2O_5 to exhaust such credit. Such option shall be exercised by notice given by Fansteel

to Union Carbide not later than August 15, 1969. The amounts of Cb_2O_5 to be credited against Union Carbide's obligation to deliver Cb_2O_5 shall be based upon the actual Cb_2O_5 content contained in natural ores delivered to Union Carbide for processing with the assumption of an 85% yield from such ores. Until such time as all of such Cb_2O_5 retained by Fansteel shall be credited against Union Carbide's obligations, Union Carbide shall be entitled to retain all Cb_2O_5 extracted from ores delivered to Union Carbide for processing pursuant to said Paragraph (b).

With respect to any Cb_2O_5 extracted from Fansteel's ores in excess of the amounts referred to in the preceding paragraph (or, if Fansteel elects not to retain the Cb_2O_5 now owed to Union Carbide, then with respect to all Cb_2O_5 extracted from Fansteel's ores), the parties agree that Fansteel shall have the right to sell such Cb_2O_5 to Union Carbide at a price to be agreed upon from time to time by the parties, but not less than \$1.40 per pound of Cb_2O_5 . In the event that the parties are unable to agree upon a price for such Cb_2O_5 , then Fansteel shall have the option of either accepting delivery of such Cb_2O_5 or requiring Union Carbide to purchase such Cb_2O_5 at the price of \$1.40 per pound.

Section 2. Fansteel agrees to purchase its entire requirements of refined Ta_2O_5 during the period from January 1, 1970 through December 31, 1971 (except for inventories on hand as of January 1, 1970), and Union Carbide

shall supply such requirements at the price set forth in the preceding Section 1. In the event that during the term of this Agreement Fansteel has satisfied its requirements for refined Ta_2O_5 but has not purchased or had processed 220,000 pounds of tantalum contained in Ta_2O_5 or that amount of tantalum contained in Ta_2O_5 equivalent in number to the amount of capacitor grade tantalum powder sold and delivered to Union Carbide hereunder, whichever is lower, such lower amount being hereinafter referred to as the "Basic Quantity", then, on or before December 31, 1971, Fansteel may commit itself to purchase or to have processed tantalum contained in Ta_2O_5 up to the Basic Quantity for future delivery extending beyond the term of this Agreement, with the purchase or processing price to be paid at the time of such delivery; provided, however, that in such event, Fansteel agrees to accept delivery of such Ta_2O_5 before making other purchases of Ta_2O_5 from any other source, and, in any event, not later than December 31, 1972.

Section 3. In the event that Fansteel has not purchased (or had processed), or committed itself to purchase (or have processed) the Basic Quantity of tantalum contained in Ta_2O_5 pursuant to the foregoing Section 2, then Union Carbide, at its option, shall have the right until June 30, 1972, to obtain additional capacitor grade tantalum powder from Fansteel up to an amount measured by the difference

between the Basic Quantity and Fansteel's purchases or processing (and purchase or processing commitments) of tantalum contained in Ta_2O_5 during the term of this Agreement, on a material exchange basis, with Union Carbide delivering to Fansteel a quantity of Thailand tantalum-bearing tin slags (hereinafter called the "Thai slags") on an exchange ratio with the said Thai slags containing the following number of pounds of Ta_2O_5 , dry weight, for each pound of tantalum powder of the following grades delivered to Union Carbide under this section:

<u>Powder Grade</u>	<u>Pounds Ta_2O_5 Contained</u>
FD	6.15 pounds
FG	5.40 pounds
FC-18	6.00 pounds

The Thai slags delivered pursuant to this Agreement shall average, in the aggregate, not less than 12% Ta_2O_5 and 9% Cb_2O_5 , and no individual lot shall contain less than 11% Ta_2O_5 and 8% Cb_2O_5 .

ARTICLE III

SAMPLING AND ANALYSIS PROCEDURES

Section 1. Thai Slags. Sampling and analysis procedures with respect to Thai slags to be delivered to Fansteel hereunder shall be as follows:

(a) Weighing. The dry weight of each lot of the Thai slags delivered to it shall be determined by Fansteel in accordance with its customary procedures, and such dry weight shall be promptly reported to Union Carbide. The dry weight as determined by Fansteel shall be conclusive and binding upon both parties unless Union Carbide shall elect, within ten days following receipt of Fansteel's report, to have the dry weight determined by Ledoux & Co., 359 Alfred Avenue, Teaneck, New Jersey. If Union Carbide so elects, the determination of dry weight shall be made by Ledoux & Co. and its determination shall be conclusive and binding upon the parties. The costs of such determination of dry weight by Ledoux & Co. shall be borne in equal shares by Fansteel and Union Carbide.

(b) Sampling and Analysis.

(i) Upon receipt of each shipment, Fansteel shall sample the material (as one lot) in accordance with the procedure described in the attached Exhibit G, which is, by this reference thereto, made a part of this Agreement, and shall prepare a composite lot sample which it shall then

analyze for Ta_2O_5 content and Cb_2O_5 content. Such analysis, certified by an officer of Fansteel, shall be promptly delivered to Union Carbide.

(ii) If the analysis made by Union Carbide and the analysis made by Fansteel agree within 0.5% by weight in respect to the Ta_2O_5 content of the shipment, the Ta_2O_5 content of such shipment shall, for all purposes of this Agreement, be conclusively deemed to be the average of the Ta_2O_5 analyses made by the two parties. Similarly, if the analyses made by Union Carbide and Fansteel agree within 1.0% by weight in respect to the Cb_2O_5 content of the shipment, the Cb_2O_5 content of the shipment shall, for all purposes of this Agreement, be conclusively deemed to be the average of the Cb_2O_5 analyses made by the two parties.

If the analyses of Fansteel and Union Carbide as to either the Ta_2O_5 content or the Cb_2O_5 content shall not agree within the tolerances above expressed, the shipment shall be sampled by Ledoux & Co. in accordance with the procedures described in Exhibit G and the composite lot sample so taken shall be analyzed by Ledoux & Co. for the content as to which the parties are in disagreement. If the analysis made by Ledoux & Co. is intermediate to the analyses made by Fansteel and Union Carbide, the analysis by Ledoux & Co. shall be conclusive and binding on both parties; otherwise

the analysis of Fansteel or Union Carbide which is closest to the analysis of Ledoux & Co. shall be conclusive and binding on both parties. Costs of the sampling and analysis by Ledoux & Co. shall be borne in equal shares by Fansteel and Union Carbide.

(c) Extractability. The final composite lot sample with respect to each lot of the Thai slags delivered to Fansteel by Union Carbide shall be tested by Fansteel for extractability of Ta_2O_5 in accordance with the procedure described in the attached Exhibit H, which is, by this reference thereto, made a part of this Agreement. If it is determined by Fansteel that the Ta_2O_5 content of any lot of Thai slags is less than 0.95 extractable, then Union Carbide shall deliver to Fansteel a supplemental quantity of Thai slags containing a quantity of Ta_2O_5 equal to the number of pounds of Ta_2O_5 contained in said lot, multiplied by the difference between 0.95 and the decimal fraction of Ta_2O_5 which Fansteel has determined to be extractable from said lot.

(d) Containers. Each lot of Thai slags shall be delivered to Fansteel in nonreturnable drums.

Section 2. Natural Ores. Any ore to be delivered by Fansteel to Union Carbide for the purpose of extraction of Ta_2O_5 pursuant to the provisions of Section 1(b) of Article II hereof shall be weighed, sampled and analyzed

in accordance with the procedures provided by Paragraphs (a) and (b) of the foregoing Section 1 relating to Thai slags provided that the positions of Fansteel and Union Carbide shall be the reverse of those set forth in said Section 1. Each lot of natural ores shall be delivered by Fansteel to Union Carbide in nonreturnable drums.

Section 3. Ta_2O_5 and Cb_2O_5 . Ta_2O_5 and Cb_2O_5 to be delivered by Union Carbide to Fansteel shall be accompanied by a certified chemical analysis showing that such material meets the specifications contained in Exhibits D and E, respectively. If Fansteel's analysis of such material shows that it does not meet such specifications, then Fansteel may reject the material, provided however, that in such event Union Carbide shall have the right to submit such material to Ledoux & Co. for re-analysis. The said re-analysis by Ledoux & Co. shall be final and binding upon both parties. If such material is determined by the Ledoux analysis to be out of specification, the cost of such analysis shall be borne by Union Carbide; if said analysis shows such material to be within specifications, the cost of such analysis shall be borne by Fansteel.

Section 4. Failure to Meet Specifications. If any material purchased or processed by Union Carbide or Fansteel

hereunder fails to meet the specifications provided for such material, such material shall be returned to the party selling or processing such material and shall be replaced by such party with material meeting all specifications within 90 days. All cost of transshipping such material shall be borne by the party having provided or processed the material.

ARTICLE IV

PAYMENT AND DELIVERY

Section 1. Payment. Each party to whom payments are due hereunder shall furnish the other party with invoices on a monthly basis, and such other party shall pay the invoicing party the total amount due under any such invoice within ten days after the end of the calendar month during which such invoice was rendered.

Section 2. Scheduling. Each party shall give the other party written notice of its requirements for any material hereunder as far in advance as practicable and shall advise the other party of its requirements for delivery during any calendar quarter not less than 60 days prior to the beginning of such calendar quarter. Notwithstanding the foregoing, if, by reason of circumstances beyond the control of either party, such party is unable to give such advance notice

of its requirements during a calendar quarter, the other party shall nonetheless use its best efforts to satisfy such requirements.

The time and place of delivery with respect to particular lots of material to be delivered or processed hereunder, as well as the amount of material to be included within such lot, shall be as agreed upon by the parties.

Section 3. Freight Charges and Risk of Loss.

Freight and transportation charges pertaining to material shipped by either party to the other shall be borne by the shipping party and such material shall be delivered f.o.b. Muskogee, Oklahoma or North Chicago, Illinois for such material to be delivered to Fansteel or f.o.b. Marietta or Cleveland, Ohio or Greenville, South Carolina, if such material is to be delivered to Union Carbide. Title to and risk of loss for such materials shall remain at all times in the shipping party until delivery thereof except (a) in the case of natural ores delivered by Fansteel to Marietta for extraction of Ta_2O_5 , in which case title to and risk of loss of such material shall remain at all times in Fansteel, provided that risk of loss for such materials shall be with Union Carbide during the time such materials are at its premises under its control, and (b) in the case of out-of-specification Ta_2O_5 consigned to Fansteel pursuant to the

provisions of Article I, Section 3, risk of loss for such materials shall be with Fansteel during the time such materials are at its premises under its control.

ARTICLE V

GENERAL

Section 1. Interdependence of Provisions. All of the undertakings, agreements and promises herein contained to be performed by each of the parties are interdependent with the undertakings, agreements and promises herein contained to be performed by the other party. The performance of its obligations by each of the parties is the consideration for the performance of the obligations of the other party.

Section 2. Force Majeure. Neither party hereto shall be liable to the other for default or delay in the performance of any of its obligations hereunder when any such default or delay is caused by strike, riot, war, fire, act of God, governmental order or regulations, curtailment of or failure in obtaining sufficient electricity, steam or other type of power, or any other occurrence beyond the control of the respective parties hereto.

Section 3. Assignment. Any assignment of this Agreement or any rights hereunder by either party hereto without the written consent of the other shall be void.

This Agreement shall be binding upon and shall inure to the benefit of the legal successors of the respective parties hereto.

Section 4. Notice. It shall be a sufficient giving of any notice or other communication hereunder if the party giving the same shall deposit a copy thereof in the post office in a registered envelope postage prepaid or shall file a prepaid radiogram or telegram with a radio or telegraph company addressed to the other party at its address set forth below or at such other address as the other party shall have theretofore in writing designated. Payments to be made hereunder shall be transmitted to the address to which notices at that time shall be addressed as above provided and may be so transmitted in an envelope deposited or radio or telegram filed as above provided. All notices to Union Carbide shall be addressed to Dr. Milton Stern, Electronics Division, Union Carbide Corporation, 270 Park Avenue, New York, New York 10017, and all notices to Fansteel shall be addressed to Lawrence T. Lindgren, Fansteel Inc., 21515 Hawthorne Boulevard, Torrance, California 90503 or to such other address as either party may, in writing, specify. The date of giving any such notice or other communication, and the date of making

any such payment provided such payment is received shall be the date on which such envelope was deposited or such radio or telegram was filed. The post office receipt or the receipt supplied by the radio or telegraph company showing the date of such deposit or filing shall be prima facie evidence of these facts.

Section 5. Headings. The headings of the several ARTICLES of this Agreement and the captions of paragraphs of this Agreement have been inserted for convenience of reference only and shall in no way affect the interpretation of any of the items or provisions thereof.

Section 6. Entire Agreement. The entire agreement is contained herein and there are no promises, representations or warranties affecting it other than those expressly set forth herein.

Section 7. Applicable Law. This Agreement has been executed in conformance with and shall be interpreted in accordance with the laws of the State of New York.

IN WITNESS WHEREOF, the parties have executed
this Agreement on the day and year first above written.

UNION CARBIDE CORPORATION

By Milton Stein *JS*

Title Vice President of its
Electronics Division

FANSTEEL INC.

By Warren Hayes

Title President



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Amalgamet, Inc.
Amalgamet-Finamines
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Amalgamet, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Shell Offshore Inc.
Billiton Trading Co. - Thailand Smelting
Richard H. Tallant, CEO
150 N. Dairy Ashford Road
Houston, Texas 77079

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Shell Offshore Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
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9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
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16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
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19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
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Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
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Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

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Whippany, New Jersey 07981

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135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
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Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Metallurg, Inc.
GFE Conversion
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
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 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

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Corporation Service Company
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251 Little Falls Drive
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General Services Administration (GSA):

Kris Durmer
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Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

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Heinz Schimmelbusch, CEO
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Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Osram Sylvania Inc.
GTE - Sylvania
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Osram Sylvania Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bayer Corporation
Hermann C. Stark, Inc.
Philip Blake, President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Bayer Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Kennametal Inc.
Christopher Rossi, President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Kennametal Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
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Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

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10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
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ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Philips Holding USA Inc.
For Philips North America LLC
Mepco Electra
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Philips Holding USA Inc. For Philips North America LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
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 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

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(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
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White Plains, New York 10605

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Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
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Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
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Wayne, Pennsylvania 19087

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For Metallurg, Inc.
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Fair Lawn, New Jersey 07410

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For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Metallurg, Inc.
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Everzinc USA Inc.
Sogem Corporation - Norore Division
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Everzinc USA Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Union Carbide Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

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10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
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19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
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Michael Flieger, CEO
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Corporate Creations Network Inc.
For Osram Sylvania Inc.
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100 Bayer Boulevard
Whippany, New Jersey 07981

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Indianapolis, Indiana 46204

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Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Valenite, LLC
Valeron Metals
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Valenite, LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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Hamish Michie, CEO
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For Shell Offshore Inc.
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President and CEO
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Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

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Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
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251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Corporation Trust Company
For Shell Offshore Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Shell Offshore Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Corporation Trust Company
For Metallurg, Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

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10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
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ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):
Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Building Suite 104
Wilmington, DE 19810

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Osram Sylvania Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
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 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
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 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
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 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
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For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

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Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
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Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
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Wilmington, Delaware 19801

Osram Sylvania Inc.
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Michael Flieger, CEO
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For Osram Sylvania Inc.
3411 Silverside Road
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100 Bayer Boulevard
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Christopher Rossi
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Vitor Rocha, CEO
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3717 National Drive
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Raleigh, North Carolina 27612

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Albany, New York 12207

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7501 State Highway 185 North
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CT Corporation System
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28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
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Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Bayer Corporation
135 N. Pennsylvania Street, Suite 1610
Indianapolis, IN 46204

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Bayer Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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The following definitions shall apply to the following words as they appear in this enclosure:

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2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporate Service Company
For Philips Holding USA Inc.
251 Little Fall Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Philips Holding USA Inc. For Philips North America LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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Sincerely yours,

**SUSAN
WEBSTER**

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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Everzinc USA Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

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10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
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ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
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Osram Sylvania Inc.
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Michael Flieger, CEO
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Corporate Creations Network Inc.
For Osram Sylvania Inc.
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Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
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100 Bayer Boulevard
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135 N. Pennsylvania Street, Suite 1610
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Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, NY 10005

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Union Carbide Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
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6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
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 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

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For Shell Offshore Inc.
1209 Orange Street
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President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
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Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
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Wayne, Pennsylvania 19087

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Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Valenite, LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/3/2021 4:29:51 PM
To: Catherine Crow - LR [catherine.crow@gsa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Katharine Healy - LR [katharine.healy@gsa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request

Catherine,

Thank you for letting us know. We will make note of the change and send future correspondence to Kate Healy.

From: Catherine Crow - LR <catherine.crow@gsa.gov>
Sent: Monday, February 1, 2021 4:26 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Katharine Healy - LR <katharine.healy@gsa.gov>
Subject: Re: Fansteel Metals 104(e) Information Request

Lance,

Kris Durmer is no longer with GSA. Our current General Counsel is Nitin Shah. You may send future correspondence regarding this matter and similar requests to Kate Healy at katharine.healy@gsa.gov. She is also copied on this email.

Sincerely,

Catherine Crow
Acting Associate General Counsel
Real Property Division (LR), GSA Office of General Counsel
(202) 501-4536

The information contained in this e-mail message is intended only for the addressee(s) and may be protected by the attorney-client privilege and/or work product doctrine. Please do not forward or further disseminate this message without the consent of the sender.

On Mon, Feb 1, 2021 at 3:09 PM Nixon, Lance <Nixon.Lance@epa.gov> wrote:

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer

U.S. Environmental Protection Agency

Superfund and Emergency Management Division

Assessment and Enforcement Branch

214-665-2203

Message

From: Nixon, Lance [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=28DC2981F6CE42E9AD8CA82FD6D609AE-NIXON, LANCE]
Sent: 2/3/2021 4:25:49 PM
To: Gerry Caron [gerry.caron@cabotcorp.com]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.
Attachments: Cabot Document 1988.pdf

Hi Gerry,

Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, by cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information

Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

This e-mail and any attachments are for use by the intended recipient and may contain confidential, privileged or proprietary information. Any use, dissemination, distribution, or reproduction of this message by unintended recipients is prohibited. If you have received this e-mail in error, please notify the sender immediately by telephone or e-mail and delete the original message. Thank you.

750
CABOT

February 3, 1988

Donna Gilstrap
Fansteel Metals
Number Ten Tantalum Place
Muskogee, OK 74401

Re: Tantalum/Tin Slag Ore "Swap"

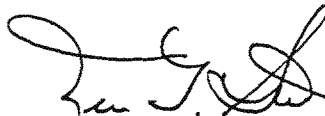
Dear Donna:

Enclosed please find Summary of Tin Slag Shipped, their gross weights, analysis and copies of scale tickets.

The last load (load #12) departed our plant on February 2, 1988.

If you have any questions, please call.

Sincerely,



William L. Sheubrooks
Shipping Supervisor

WS/11

xc: W. Rasmussen

Cabot Corporation
County Line Road
Boyertown, Pennsylvania 19512
Phone: 215 367-2181

CABOT

Summary of Thais Tin Slag:

	<u>Cabot</u>	<u>Marks</u>	<u>Drums</u>	<u>Net Wet lbs</u>	<u>Moisture</u>	<u>Net Dry lbs</u>	<u>Ta2o5 lbs</u>	<u>Cb205 %</u>
2521	2429	592	120	117,743.24	35.32 lbs .03%	117,707.92	17,197.13 14.61%	11.91%
2522	2444	588	120	111,957.22	33.59 .03%	111,923.63	17,392.93 15.54%	12.15%
2523	2515	654	120	110,929.86	33.28 .03%	110,896.58	17,133.52 15.45%	11.73%
2524	2520	661	120	110,784.35	33.24 .03%	110,751.11	16,740.03 15.115%	11.12%

Summary of Gross Weights Shipped to Fansteel:

<u>Load #</u>	<u>Cabot Lot</u>	<u>Marks</u>	<u>No. Drums</u>	<u>Gross lbs</u>	<u>Remarks</u>
1	2429	592	40	43,620	
2	"	"	40	43,300	
3	"	"	40	43,340	
Total Lot 2429				130,260	
4	2444	588	40	40,820	
5	"	"	40	42,135	Cabot Scale
6	"	"	40	42,880	
Total Lot 2444				125,835	
7	2515	654	40	40,400	
8	"	"	40	40,872	Cabot Scale
9	"	"	40	40,260	
Total Lot 2515				121,532	
10	2520	661	40	41,560	
11	"	"	40	40,214	Cabot Scale
12	"	"	40	41,340	
Total Lot 2520				123,114	

Note: Cabot Scale indicates that each pallet of ore was weigh-out using our dock scale.

CABOT

Summary of Analysis: (Percent unless indicated otherwise)

Elements	<u>Lot 2429</u>	<u>Lot 2444</u>	<u>Lot 2515</u>	<u>Lot 2520</u>
Ta2O5	14.61	15.54	15.45	15.115
Cb2O5	11.91	12.15	11.73	11.12
Al	1-10	1-10	1-10	1-10
Ba	.05-.1	.1-.5	.1-.5	.01-.05
B	.01-.05	.01-.05	.01-.05	.01-.05
Ca	1-10	1-10	1-10	1-10
Cr	.1-.5	.1-.5	.1-.5	.1-.5
Hf	.1-.5	.1-.5	.1-.5	.1-.5
Fe	1-10	1-10	1-10	1-10
Mg	.5-1.0	.1-.5	.1-.5	.05-.1
Mn	1-10	1-10	1-10	1-10
Si	1-10	-	1-10	1-10
Na	.1-.5	.1-.5	.5-1.0	.1-.5
Th	.1-.5	.1-.5	.1-.5	.1-.5
Sn	1-10	.5-1.0	.1-.5	.5-1.0
Ti	1-10	1-10	1-10	1-10
W	.1-.5	.1-.5	.1-.5	.1-.5
U	.05-.1	.1-.5	.1-.5	.1-.5
V	.1-.5	.1-.5	.1-.5	.1-.5
Zn	1-10	-	1-10	1-10
P	.39	.16	.41	.54
S	450 ppm	590 ppm	540 ppm	510 ppm
C	785 ppm	-	450 ppm	.13%

Message

From: Steger, Mark J. [msteger@clarkhill.com]
Sent: 3/22/2021 3:29:23 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Sniadanko, Jeffrey M. [jsniadanko@clarkhill.com]; Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]; Gladstein, Richard (ENRD) [Richard.Gladstein@usdoj.gov]
Subject: RE: Fansteel Site- Access to Responses to EPA January 2021 Request for Information

Done-thanks

Mark J. Steger

CLARK HILL PLC

130 East Randolph Street, Suite 3900 | Chicago, IL 60601
312.985.5916 (Direct) | 312.985.5964 (Fax) | 847.274.1303 (Cell)
MSteger@ClarkHill.com | www.clarkhill.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Monday, March 22, 2021 10:03 AM
To: Steger, Mark J. <msteger@clarkhill.com>
Cc: Sniadanko, Jeffrey M. <jsniadanko@clarkhill.com>; Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>; Gladstein, Richard (ENRD) <Richard.Gladstein@usdoj.gov>
Subject: RE: Fansteel Site- Access to Responses to EPA January 2021 Request for Information

[External Message]

Hello Mark!

Thanks again for your call last week—I have confirmed that Fansteel will need to submit this request through our FOIA Online system. The submittal form is available at this link: <https://foiaonline.gov/foiaonline/action/public/request>

Thanks and let me know if you have any questions!

Sincerely,
Elizabeth

From: Steger, Mark J. <msteger@clarkhill.com>
Sent: Friday, March 19, 2021 11:13 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Sniadanko, Jeffrey M. <jsniadanko@clarkhill.com>
Subject: Fansteel Site- Access to Responses to EPA January 2021 Request for Information
Importance: High

Elizabeth- This email summarizes what we discussed with respect to our client needing access to information being received by EPA in response to its January 2021 Request for Information.

First-We would like to obtain the contact information from any party that has contacted EPA in response to the Request for Information. We would like this information so that when we file the complaint we can reach out to these individuals to identify to whom we need to seek a waiver of service. Also, if we have identified the wrong party, we can explore with the individual as to the identity of the responsible party.

Second, we would like copies of all the responses that EPA has received. WE also request copies of EPA's responses to any requests for information. As you know, we are tracking the information for which EPA has requested waiver of our CBI claim so that the documents can be provided to the requesting party.

This information is being requested to that we can expedite the litigation effort and begin the process of attempting to reach a settlement with the defendant thereby avoiding incurring significant legal fees. We understand EPA's statutory obligation to respond to the public's request for information. However, because it appears that we have the most comprehensive set of documents related to the Site, we would assist EPA in getting responsive information out to the public while at the same time assisting in the furtherance of resolving a PRP's response const liability at the Site.

If EPA cannot provide this information unless we submit a FOIA request for such information, please consider this email such a FOIA request. IF you need additional information, please contact me.

Mark

Mark J. Steger

CLARK HILL PLC

130 East Randolph Street, Suite 3900 | Chicago, IL 60601
312.985.5916 (Direct) | 312.985.5964 (Fax) | 847.274.1303 (Cell)
MSteger@ClarkHill.com | www.clarkhill.com

Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/22/2021 3:02:40 PM
To: Steger, Mark J. [msteger@clarkhill.com]
CC: Sniadanko, Jeffrey M. [jsniadanko@clarkhill.com]; Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]; Gladstein, Richard (ENRD) [Richard.Gladstein@usdoj.gov]
Subject: RE: Fansteel Site- Access to Responses to EPA January 2021 Request for Information

Hello Mark!

Thanks again for your call last week—I have confirmed that Fansteel will need to submit this request through our FOIA Online system. The submittal form is available at this link: <https://foiaonline.gov/foiaonline/action/public/request>

Thanks and let me know if you have any questions!

Sincerely,
Elizabeth

From: Steger, Mark J. <msteger@clarkhill.com>
Sent: Friday, March 19, 2021 11:13 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Sniadanko, Jeffrey M. <jsniadanko@clarkhill.com>
Subject: Fansteel Site- Access to Responses to EPA January 2021 Request for Information
Importance: High

Elizabeth- This email summarizes what we discussed with respect to our client needing access to information being received by EPA in response to its January 2021 Request for Information.

First-We would like to obtain the contact information from any party that has contacted EPA in response to the Request for Information. We would like this information so that when we file the complaint we can reach out to these individuals to identify to whom we need to seek a waiver of service. Also, if we have identified the wrong party, we can explore with the individual as to the identity of the responsible party.

Second, we would like copies of all the responses that EPA has received. WE also request copies of EPA's responses to any requests for information. As you know, we are tracking the information for which EPA has requested waiver of our CBI claim so that the documents can be provided to the requesting party.

This information is being requested to that we can expedite the litigation effort and begin the process of attempting to reach a settlement with the defendant thereby avoiding incurring significant legal fees. We understand EPA's statutory obligation to respond to the public's request for information. However, because it appears that we have the most comprehensive set of documents related to the Site, we would assist EPA in getting responsive information out to the public while at the same time assisting in the furtherance of resolving a PRP's response const liability at the Site.

If EPA cannot provide this information unless we submit a FOIA request for such information, please consider this email such a FOIA request. IF you need additional information, please contact me.

Mark

Mark J. Steger

CLARK HILL PLC
130 East Randolph Street, Suite 3900 | Chicago, IL 60601

312.985.5916 (Direct) | 312.985.5964 (Fax) | 847.274.1303 (Cell)
MSteger@ClarkHill.com | www.clarkhill.com

Message


From: Aselda.Thompson@shell.com [Aselda.Thompson@shell.com]
Sent: 3/1/2021 8:39:55 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel 104(e) information request

Thanks very much, Liz – that's helpful and I've passed along to the people doing the investigating for us. In the meantime, I'd like to formally request an extension of time to respond. We received the letter into our Houston mailroom on February 9th, so 30 days would put us at March 11th. While it's possible that we will have completed our search, I would like to request an additional 30 days to ensure we have the time to conduct a thorough search. Would EPA be able to approve an extension until April 10th?

Many thanks,

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Monday, March 1, 2021 12:30 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hi Aselda! Well it was definitely warmer this weekend thank goodness! I hope you had a good weekend too.

Please see attached two records we have that mention the entity referred to as "Billiton." We received these records in a response to a 104(e) request from the facility owner/operator, Fansteel Inc. Fansteel identified this entity as Billiton Trading Company, Inc. As I mentioned in my voicemail last week, our contractors did some preliminary corporate research and indicated that Billiton Trading Company, Inc. at some point merged with Shell Offshore Inc. In an effort to keep costs down, we did not request the analysis behind this preliminary determination. I'll talk to my clients to see if we can obtain the analysis to give you a better idea of the connection between Billiton and Shell. In the meantime, please let me know if these attached records help with Shell's research.

Sincerely,
Elizabeth

From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 11:48 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request

Hi Liz,

Hope you had a great weekend!

I'm working with my client groups to track down any information we may have to any of these entities and I'm hoping you might be able to provide what EPA believes to be the nexus or connection to Shell? That will help us direct our search.

Many thanks!

Aselda

From: Thompson, Aselda J SHLOIL-LSPT/EE
Sent: Wednesday, February 17, 2021 2:20 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request


Thanks for the response Liz – these are crazy times for Texas! It would be helpful to have an extension of time, and I'd also like to ask if you're able to provide any information or documents that demonstrate the nexus or connection of Shell to the site – this will definitely help us to search our records more efficiently.

Glad you hear you're all doing ok! We're in the same boat – glad to have power and water, at least for now.

Take care and we can talk when things calm down.

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 17, 2021 12:07 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Subject: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe you have received this communication in error, please delete the copy you received, and do not print, copy, re-transmit, disseminate or otherwise use the information. Thank you.

Message

From: Gerry Caron [gerry.caron@cabotcorp.com]
Sent: 2/2/2021 9:14:38 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.
Attachments: Fansteel Cabot Corporation 104e for email.pdf

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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FANSTEEL 104(e) MAILING
TRACKING SHEET
January/February 2021

PRP	DATED	MAILED	CERTIFIED #	RESPONSE RECVD	RESPONDEE	RETURNED UNDELIVERABLE	COMMENTS
Amalgamet, Inc. Amalgamet-Finamines Hamish Michie CEO 222 Bloomingdale Road Suite 101 White Plains, NY 10605							
Shell Offshore Inc. Billiton Trading Co. - Thailand Smelting Richard H. Tallant CEO 150 N. Dairy Ashford Road Houston, TX 77079							
Cabot Corporation Cabot Corporation Sean D. Keohane President and CEO Two Seaport Lane Suite 1300 Boston, MA 02210							
Osram Sylvania Inc. GTE - Sylvania Michael Flieger CEO 200 Ballardvale Street Wilmington, MA 01887							

Bayer Corporation Hermann C. Stark, Inc. Philip Blake President and CEO 100 Bayer Boulevard Whippany, NJ 07981							
Kennametal Inc. Kennametal, Inc. Christopher Rossi President and CEO 525 William Penn Place Suite 330 Pittsburgh, PA 15219							
Philips Holding USA Inc. For Philips North America LLC Mepeco Electra Vitor Rocha CEO 222 Jacobs Street 3rd Floor Cambridge, MA 02141							
Metallurg, Inc. Metallurg, Inc. Heinz Schimmelbusch CEO 435 Devon Park Drive Building 200 Wayne, PA 19087							

<p>Everzinc USA Inc. Sogem Corporation - Norore Division Vincent Dujardin CEO 3717 National Drive Suite 105 Raleigh, NC 27612</p>							
<p>Union Carbide Corporation Union Carbide Corporation Richard A. Wells CEO 7501 State Highway 185 North North Seadrift, TX 77983</p>							
<p>Valenite, LLC Valeron Metals Richard Askin Manager 1702 Nevins Road Fair Lawn, NJ 07410</p>							

Message

From: Catherine Crow - LR [catherine.crow@gsa.gov]
Sent: 2/1/2021 10:26:14 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Katharine Healy - LR [katharine.healy@gsa.gov]
Subject: Re: Fansteel Metals 104(e) Information Request

Lance,

Kris Durmer is no longer with GSA. Our current General Counsel is Nitin Shah. You may send future correspondence regarding this matter and similar requests to Kate Healy at katharine.healy@gsa.gov. She is also copied on this email.

Sincerely,

Catherine Crow
Acting Associate General Counsel
Real Property Division (LR), GSA Office of General Counsel
(202) 501-4536

The information contained in this e-mail message is intended only for the addressee(s) and may be protected by the attorney-client privilege and/or work product doctrine. Please do not forward or further disseminate this message without the consent of the sender.

On Mon, Feb 1, 2021 at 3:09 PM Nixon, Lance <Nixon.Lance@epa.gov> wrote:

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer

U.S. Environmental Protection Agency

Superfund and Emergency Management Division

Assessment and Enforcement Branch

214-665-2203

Message

From: Nixon, Lance [Nixon.Lance@epa.gov]
Sent: 2/1/2021 8:22:47 PM
To: karen.kalita@cabotcorp.com
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: Fansteel Metals 104(e) Information Request
Attachments: Fansteel Cabot Corporation 104e for email.pdf; ATPFile_CE6EEE48-3663-4393-AEBB-9A55F7C1723F.token

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

Message

From: Kradin, Ben [Ben.Kradin@osram.com]
Sent: 3/17/2021 11:59:44 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: Re: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Thank you!

Ben Kradin
Corporate Counsel
LC AME

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, March 17, 2021 12:00:52 PM
To: Kradin, Ben <Ben.Kradin@osram.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Mr. Kradin,

Your request for a 60 day extension to respond to the 104(e) Request for information for the Fansteel Metals Facility has been approved. Please provide a partial response by April 12, 2021. The final response is now due May 12, 2021. Your cooperation is greatly appreciated.

Thanks
-Lance

From: Kradin, Ben <Ben.Kradin@osram.com>
Sent: Friday, March 12, 2021 5:09 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Dear Ms. Pletan and Mr. Nixon,

OSRAM SYLVANIA is respectfully requesting a 60-day extension for the 104(e) request for information due today. As I mentioned over voicemail, I am currently out on parental leave and this extension would provide sufficient time for OSRAM SYLVANIA to conduct a meaningful search. Thank you for your consideration and please feel free to reach out with questions.

Meanwhile, have a great weekend.

Cheers,

Ben Kradin
CIPP/US, CIPM, FIP
Corporate Counsel
Compliance Officer, USC

OSRAM SYLVANIA INC.
GC AMERICAS
200 Ballardvale Street

Wilmington, MA 01887
Tel.: (978) 570-3077
Cell: (978) 809-6610
ben.kradin@osram.com
www.osram.us

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Corporation Trust Company
For Shell Offshore Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Shell Offshore Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Cabot Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
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5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

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15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

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18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

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(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

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Christopher Rossi
President and CEO
525 William Penn Place
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Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
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Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Corporation Trust Company
For Metallurg, Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
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Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
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FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

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Catherine Crow (Catherine.crow@gsa.gov)
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Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Building Suite 104
Wilmington, DE 19810

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Osram Sylvania Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

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(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Bayer Corporation
135 N. Pennsylvania Street, Suite 1610
Indianapolis, IN 46204

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Bayer Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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**SUSAN
WEBSTER**

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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

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4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporate Service Company
For Philips Holding USA Inc.
251 Little Fall Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Philips Holding USA Inc. For Philips North America LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
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5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

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19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

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Heinz Schimmelbusch, CEO
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Wayne, Pennsylvania 19087

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Vitor Rocha, CEO
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(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Corporation Trust Company
For Metallurg, Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
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FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

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Catherine Crow (Catherine.crow@gsa.gov)
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Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Everzinc USA Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

C T Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, NY 10005

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

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Sincerely yours,

**SUSAN
WEBSTER**

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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Valenite, LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
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QUESTIONS

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3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
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Michael Flieger, CEO
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Corporate Creations Network Inc.
For Osram Sylvania Inc.
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100 Bayer Boulevard
Whippany, New Jersey 07981

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Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Amalgamet, Inc.
Amalgamet-Finamines
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Amalgamet, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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Hamish Michie, CEO
222 Bloomingdale Road
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White Plains, New York 10605

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(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
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For Shell Offshore Inc.
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Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

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General Counsel
Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

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(FKA GFE Conversion)
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Wayne, Pennsylvania 19087

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Shell Offshore Inc.
Billiton Trading Co. - Thailand Smelting
Richard H. Tallant, CEO
150 N. Dairy Ashford Road
Houston, Texas 77079

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Shell Offshore Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
VIA ELECTRONIC MAIL

Cabot Corporation
Sean D. Keohane, President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210
karen.kalita@cabotcorp.com

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Cabot Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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**SUSAN
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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
VIA ELECTRONIC MAIL

General Services Administration
Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405
Catherine.crow@gsa.gov

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that General Services Administration (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for

disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
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9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
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16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
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19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
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Whippany, New Jersey 07981

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135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Metallurg, Inc.
GFE Conversion
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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(FKA Amalgamet-Finamines)
Hamish Michie, CEO
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For Shell Offshore Inc.
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President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
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Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

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For Osram Sylvania Inc.
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Albany, New York 12207

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Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Osram Sylvania Inc.
GTE - Sylvania
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Osram Sylvania Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Bayer Corporation
Hermann C. Stark, Inc.
Philip Blake, President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Bayer Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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**SUSAN
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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Kennametal Inc.
Christopher Rossi, President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Kennametal Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
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Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
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10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
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19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
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ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
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Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

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(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Philips Holding USA Inc.
For Philips North America LLC
Mepco Electra
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Philips Holding USA Inc. For Philips North America LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
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 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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(FKA Amalgamet-Finamines)
Hamish Michie, CEO
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White Plains, New York 10605

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President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

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Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
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Wayne, Pennsylvania 19087

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For Metallurg, Inc.
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251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Metallurg, Inc.
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Everzinc USA Inc.
Sogem Corporation - Norore Division
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Everzinc USA Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Union Carbide Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

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10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
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20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
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ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
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Michael Flieger, CEO
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Corporate Creations Network Inc.
For Osram Sylvania Inc.
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Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

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(FKA Hermann C. Stark, Inc.)
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President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

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135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

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Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
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Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Valenite, LLC
Valeron Metals
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Valenite, LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Bryant, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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(FKA Amalgamet-Finamines)
Hamish Michie, CEO
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White Plains, New York 10605

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For Shell Offshore Inc.
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President and CEO
Two Seaport Lane, Suite 1300
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Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

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General Counsel
Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
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Building 200
Wayne, Pennsylvania 19087

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For Valenite, LLC
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Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Amalgamet, Inc.
FKA Amalgamet-Finamines
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Amalgamet, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/16/2021 9:36:06 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Thank you Lance!

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Tuesday, March 16, 2021 4:12 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

John,
Please see the attached documents for your review. Please let us know if you need anything else or would like to see more documents. Thank you for your cooperation.
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 3:46 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Re: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Thanks for the update.

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, March 12, 2021 4:44:53 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Hello John,
I apologize about the delay. There was a mix-up on my part. I have the nexus documents ready, however, I have to wait until I get approval to release them to you. Once I get the approval I will send them to you immediately. Again, I'm sorry about the delay.

Thanks
-Lance

From: John Hunt <jhunt@amg-nv.com>

Sent: Friday, March 12, 2021 7:39 AM

To: Nixon, Lance <Nixon.Lance@epa.gov>

Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Have you had an opportunity to access the Nexus documents?

Thanks

John

From: Nixon, Lance <Nixon.Lance@epa.gov>

Sent: Wednesday, March 3, 2021 4:27 PM

To: John Hunt <jhunt@amg-nv.com>

Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>

Sent: Wednesday, March 3, 2021 1:08 PM

To: Nixon, Lance <Nixon.Lance@epa.gov>

Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,

John

Disclaimer

The information contained in this communication from the sender is confidential. It is intended solely for use by the recipient and others authorized to receive it. If you are not the recipient, you are hereby notified that any disclosure, copying, distribution or taking action in relation of the contents of this information is strictly prohibited and may be unlawful.

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/1/2021 7:43:38 PM
To: Reed, Weslynn (WP) [WPReed@dow.com]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility
Attachments: UnionCarbide1969.pdf

Hello Wes,

Please find attached a document showing a contractual relationship between Union Carbide and Fansteel.

Thank you,
Elizabeth

From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Wednesday, February 24, 2021 5:56 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth. I appreciate the extension and look forward to reviewing the records.
Best regards,

Wes

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 24, 2021 4:34 PM
To: Reed, Weslynn (WP) <WPReed@dow.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Weslynn,

Thank you again for your patience! This email serves as an extension of time for Union Carbide/Dow to reply to EPA's 104(e) information request. Based on the date you received the request, February 12, 2021, the new due date is April 13, 2021. We will also provide you with a written extension signed by my client.

We are still working on preparing some records to send to you; I'm hoping to provide them by the end of this week. The records show a "conversion" contract relationship between Union Carbide and Fansteel in the late 60's/early 70's pursuant to which Union Carbide provided raw material (tin slag) to Fansteel and Fansteel returned tantalum to Union Carbide.

Sincerely,

Elizabeth

From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Friday, February 19, 2021 9:18 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth. There is no rush on our end. Stay safe and warm!

Wes

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 4:07 PM
To: Reed, Weslynn (WP) <WPReed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe you have received this communication in error, please delete the copy you received, and do not print, copy, re-transmit, disseminate or otherwise use the information. Thank you.

From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed

Counsel -- U.S. Operations, Regulatory and North America

The Dow Chemical Company

2211 H.H. Dow Way, Midland, MI 48674

Office: 989.496.1167

Cell: 989.423.5564

Email: wpreed@dow.com



Message

From: John Hunt [jhunt@amg-nv.com]
Sent: 3/16/2021 9:25:28 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

We will review the attached and prepare our response. Thank you for providing the documents.

Regards,

John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Tuesday, March 16, 2021 5:12 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

John,
Please see the attached documents for your review. Please let us know if you need anything else or would like to see more documents. Thank you for your cooperation.
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 3:46 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Re: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Thanks for the update.

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, March 12, 2021 4:44:53 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Hello John,

I apologize about the delay. There was a mix-up on my part. I have the nexus documents ready, however, I have to wait until I get approval to release them to you. Once I get the approval I will send them to you immediately. Again, I'm sorry about the delay.

Thanks
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 7:39 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Have you had an opportunity to access the Nexus documents?

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, March 3, 2021 4:27 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Wednesday, March 3, 2021 1:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/1/2021 7:35:14 PM
To: Clarke, Angienell [Clarke.Angienell@epa.gov]; Nixon, Lance [Nixon.Lance@epa.gov]
Subject: FW: 104(e) Fansteel Metals Facility
Attachments: Environmental Protection Agency 2-12-21.pdf

Hi Angienell, I saw you updating the tracking spreadsheet—sorry I didn't forward this to you all—it's Union Carbide's receipt for our 104 e request letter

From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



TO: Litigation Nms Focal Point
The Dow Chemical Company
2040 DOW BLDG OFFICE 20520S, 2211 H.H. DOW WAY
MIDLAND, MI 48674-0001

RE: Process Served in New York

FOR: Union Carbide Corporation (Domestic State: NY)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: RE: Environmental Protection Agency // To: Union Carbide Corporation

DOCUMENT(S) SERVED: Letter, Attachment(s)

COURT/AGENCY: None Specified
Case # None Specified

NATURE OF ACTION: Letter of Intent - Letter by Environmental Protection Agency for Union Carbide Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site

ON WHOM PROCESS WAS SERVED: C T Corporation System, New York, NY

DATE AND HOUR OF SERVICE: By Certified Mail on 02/12/2021 postmarked on 02/04/2021

JURISDICTION SERVED : New York

APPEARANCE OR ANSWER DUE: Within 30 days of receipt

ATTORNEY(S) / SENDER(S): Susan D. Webster
United States Environmental Protection Agency
1201 Elm Street, Suite 500
Dallas, TX 75270

ACTION ITEMS: CT has retained the current log, Retain Date: 02/13/2021, Expected Purge Date: 02/18/2021

Image SOP

Email Notification, Litigation Nms Focal Point fmdnmsp@dow.com

REGISTERED AGENT ADDRESS: C T Corporation System
28 Liberty Street
New York, NY 10005
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other

**Service of Process
Transmittal**

02/12/2021

CT Log Number 539048917

TO: Litigation Nms Focal Point
The Dow Chemical Company
2040 DOW BLDG OFFICE 20520S, 2211 H.H. DOW WAY
MIDLAND, MI 48674-0001

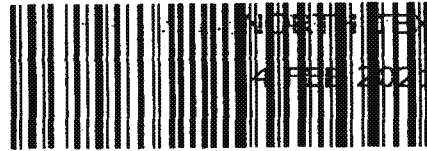
RE: Process Served in New York

FOR: Union Carbide Corporation (Domestic State: NY)

advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

CERTIFIED MAIL



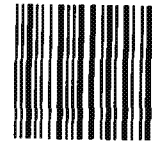
NORTH TEXAS TX 75270

4 FEB 2021 PM 7 L

7020 0640 0000 9754 2495



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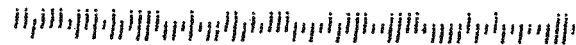
U.S. POSTAGE
FPM LETTER
ALLEN, TX
75013
FEB 04, 21
AMOUNT

\$7.2

R2305K13890

C T Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, NY 10005

10005-140099





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500

DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2495

C T Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, NY 10005

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Union Carbide Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: cn=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -05'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE - Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKA Valeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/1/2021 6:29:43 PM
To: Aselda.Thompson@shell.com
CC: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel 104(e) information request
Attachments: BillitonDocument.pdf; BillitonMemo1972.pdf

Hi Aselda! Well it was definitely warmer this weekend thank goodness! I hope you had a good weekend too.

Please see attached two records we have that mention the entity referred to as "Billiton." We received these records in a response to a 104(e) request from the facility owner/operator, Fansteel Inc. Fansteel identified this entity as Billiton Trading Company, Inc. As I mentioned in my voicemail last week, our contractors did some preliminary corporate research and indicated that Billiton Trading Company, Inc. at some point merged with Shell Offshore Inc. In an effort to keep costs down, we did not request the analysis behind this preliminary determination. I'll talk to my clients to see if we can obtain the analysis to give you a better idea of the connection between Billiton and Shell. In the meantime, please let me know if these attached records help with Shell's research.

Sincerely,
Elizabeth

From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 11:48 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request

Hi Liz,

Hope you had a great weekend!

I'm working with my client groups to track down any information we may have to any of these entities and I'm hoping you might be able to provide what EPA believes to be the nexus or connection to Shell? That will help us direct our search.

Many thanks!

Aselda

From: Thompson, Aselda J SHLOIL-LSPT/EE
Sent: Wednesday, February 17, 2021 2:20 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request


Thanks for the response Liz – these are crazy times for Texas! It would be helpful to have an extension of time, and I'd also like to ask if you're able to provide any information or documents that demonstrate the nexus or connection of Shell to the site – this will definitely help us to search our records more efficiently.

Glad you hear you're all doing ok! We're in the same boat – glad to have power and water, at least for now.

Take care and we can talk when things calm down.

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 17, 2021 12:07 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Subject: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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Message

From: Gerry Caron [gerry.caron@cabotcorp.com]
Sent: 3/1/2021 5:11:03 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance. Much appreciated. Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, March 1, 2021 11:50 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hello Gerry,
The approval letter dated February 23, 2021, extending the response for Cabot Corp. is attached.
Thank you for your cooperation.

Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Friday, February 5, 2021 8:43 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance. Much appreciated. I will reach out to you if other questions come up during our review.

Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, February 5, 2021 9:03 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Good morning,
Your request for an extension has been approved. I'll send you a signed approval letter by email hopefully next week.

-Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 5:16 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Thursday, February 4, 2021 4:32 PM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
I have submitted your request for an extension to my management. I'll be in touch as soon as hear back.
Thank you for your cooperation.

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.Elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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Message

From: Kradin, Ben [Ben.Kradin@osram.com]
Sent: 3/12/2021 11:08:52 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: 104(e) Request for Information re: Fansteel Metals Facility by OSRAM SYLVANIA INC.

Dear Ms. Pletan and Mr. Nixon,

OSRAM SYLVANIA is respectfully requesting a 60-day extension for the 104(e) request for information due today. As I mentioned over voicemail, I am currently out on parental leave and this extension would provide sufficient time for OSRAM SYLVANIA to conduct a meaningful search. Thank you for your consideration and please feel free to reach out with questions.

Meanwhile, have a great weekend.

Cheers,

Ben Kradin
CIPP/US, CIPM, FIP
Corporate Counsel
Compliance Officer, USC

OSRAM SYLVANIA INC.
GC AMERICAS
200 Ballardvale Street
Wilmington, MA 01887
Tel.: (978) 570-3077
Cell: (978) 809-6610
ben.kradin@osram.com
www.osram.us

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Message

From: Seth Rice [seth.rice@kennametal.com]
Sent: 3/1/2021 5:03:05 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: Fansteel Metals Site (Muskogee, OK): Kennametal Inc.

Good morning Elizabeth:

I'm reaching out to confirm that Kennametal Inc. received U.S. EPA's Region 6 CERCLA 104(e) information request letter regarding the Fansteel Metals site in Muskogee, Oklahoma (letter dated January 22, 2021). Please note that due to extended USPS mail delays and routing of mail within Kennametal due to COVID-19 remote working arrangements, we did not actually receive the letter at our headquarters until February 17, 2021. Accordingly, Kennametal's 30 day response deadline is March 19, 2021. We intend to reply on or before that date.

We do intend to include documents as attachments to our response letter. Can you clarify how EPA would like these documents shared electronically (e.g., ShareFile, CD, etc.) and to whom they should be sent? Our preference would be to use a ShareFile-type method given the current remote working environment Kennametal (and perhaps EPA) is in currently; this is preferred over physical mailing of documents or media. Please advise.

Regards,
Seth

Seth A. Rice
Assistant General Counsel
Global Director of Ethics & Compliance; CCEP
seth.rice@kennametal.com
T +1 412 248 8210
M +1 412 841 2918
F +1 724 539 3839
Ethics Helpline: 1-877-781-7319

Kennametal Inc. | 525 William Penn Place Suite 3300 | Pittsburgh, PA 15219 | www.kennametal.com

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Message

From: John Hunt [jhunt@amg-nv.com]
Sent: 3/12/2021 9:46:13 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: Re: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Thanks for the update.

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, March 12, 2021 4:44:53 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Hello John,

I apologize about the delay. There was a mix-up on my part. I have the nexus documents ready, however, I have to wait until I get approval to release them to you. Once I get the approval I will send them to you immediately. Again, I'm sorry about the delay.

Thanks
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 7:39 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Have you had an opportunity to access the Nexus documents?

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, March 3, 2021 4:27 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>

Sent: Wednesday, March 3, 2021 1:08 PM

To: Nixon, Lance <Nixon.Lance@epa.gov>

Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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Message

From: Tina Chiappetta - LR [christina.chiappetta@gsa.gov]
Sent: 2/9/2021 6:28:25 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Katharine Healy - LR [katharine.healy@gsa.gov]; Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: Re: Fansteel Metals Facility

This Friday looks good for us. I will send an invitation shortly. Thank you.

Tina Chiappetta
Real Property Division
Office of General Counsel
General Services Administration
1800 F Street NW, Room 2019
Washington, DC 20405
Tel.: 202 969 4102
Cell: 202 258 8626

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On Tue, Feb 9, 2021 at 1:23 PM Pletan, Elizabeth <Pletan.Elizabeth@epa.gov> wrote:

Hello Tina,

We would be happy to set up a call with you regarding the information request. So far we have availability all day Friday February 8 until 3:00 PM Central, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12 PM Central. My Thursday and Friday of next week are currently blocked off but should open up in the next couple of days if this Friday, next Tuesday or Wednesday do not work for you and your team.

Thank you,

Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch

Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Tina Chiappetta - LR <christina.chiappetta@gsa.gov>

Sent: Tuesday, February 09, 2021 10:57 AM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Katharine Healy - LR <katharine.healy@gsa.gov>; Nixon, Lance <Nixon.Lance@epa.gov>

Subject: Fansteel Metals Facility

Good morning,

We are in receipt of your request under Section 104(e) of CERCLA for information regarding Fansteel Metals Facility in Muskogee, Oklahoma. Would you be available to meet with me and my colleague, Kate Healy, to discuss your request in greater detail? We would like some additional background information to assist us in responding.

If you are available, please suggest a couple of days/times that work for you and I will set up a meeting.

Thank you.

Tina Chiappetta

Real Property Division
Office of General Counsel
General Services Administration

1800 F Street NW, Room 2019

Washington, DC 20405

Tel.: 202 969 4102

Cell: 202 258 8626

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 2/9/2021 6:23:08 PM
To: Tina Chiappetta - LR [christina.chiappetta@gsa.gov]; Katharine Healy - LR [katharine.healy@gsa.gov]; Nixon, Lance [Nixon.Lance@epa.gov]
CC: Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals Facility

Hello Tina,

We would be happy to set up a call with you regarding the information request. So far we have availability all day Friday February 8 until 3:00 PM Central, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12 PM Central. My Thursday and Friday of next week are currently blocked off but should open up in the next couple of days if this Friday, next Tuesday or Wednesday do not work for you and your team.

Thank you,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Tina Chiappetta - LR <christina.chiappetta@gsa.gov>
Sent: Tuesday, February 09, 2021 10:57 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Katharine Healy - LR <katharine.healy@gsa.gov>; Nixon, Lance <Nixon.Lance@epa.gov>
Subject: Fansteel Metals Facility

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If you are available, please suggest a couple of days/times that work for you and I will set up a meeting.

Thank you.

Tina Chiappetta
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Office of General Counsel
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Message

From: Tina Chiappetta - LR [christina.chiappetta@gsa.gov]
Sent: 2/9/2021 4:57:08 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Katharine Healy - LR [katharine.healy@gsa.gov]; Nixon, Lance [Nixon.Lance@epa.gov]
Subject: Fansteel Metals Facility

Good morning,

We are in receipt of your request under Section 104(e) of CERCLA for information regarding Fansteel Metals Facility in Muskogee, Oklahoma. Would you be available to meet with me and my colleague, Kate Healy, to discuss your request in greater detail? We would like some additional background information to assist us in responding.

If you are available, please suggest a couple of days/times that work for you and I will set up a meeting.

Thank you.

Tina Chiappetta
Real Property Division
Office of General Counsel
General Services Administration
1800 F Street NW, Room 2019
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Message

From: John Hunt [jhunt@amg-nv.com]
Sent: 3/12/2021 1:39:09 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Have you had an opportunity to access the Nexus documents?

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, March 3, 2021 4:27 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Wednesday, March 3, 2021 1:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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Message

From: Gerry Caron [gerry.caron@cabotcorp.com]
Sent: 2/5/2021 2:43:26 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance. Much appreciated. I will reach out to you if other questions come up during our review.

Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, February 5, 2021 9:03 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Good morning,

Your request for an extension has been approved. I'll send you a signed approval letter by email hopefully next week.

-Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 5:16 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Thursday, February 4, 2021 4:32 PM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,

I have submitted your request for an extension to my management. I'll be in touch as soon as hear back.

Thank you for your cooperation.

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information

relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,

Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 2/25/2021 10:24:43 PM
To: Tina Chiappetta - LR [christina.chiappetta@gsa.gov]
CC: Katharine Healy - LR [katharine.healy@gsa.gov]; Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Section 104e Request: Fansteel

Dear Tina,

Thank you for your response. We will review and let you know if we need anything else.

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Tina Chiappetta - LR <christina.chiappetta@gsa.gov>
Sent: Thursday, February 25, 2021 4:19 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Katharine Healy - LR <katharine.healy@gsa.gov>
Subject: Section 104e Request: Fansteel

Good afternoon,

Attached is GSA's response to your request for information relating to Fansteel Metals.

Please let us know if you have questions.

Thanks,

Tina Chiappetta
Real Property Division
Office of General Counsel
General Services Administration
1800 F Street NW, Room 2019
Washington, DC 20405
Tel.: 202 969 4102
Cell: 202 258 8626

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Message

From: Seth Rice [seth.rice@kennametal.com]
Sent: 3/12/2021 1:16:29 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: Kennametal Response to Fansteel Metals CERCLA 104(e) Information Request
Attachments: Kennametal Response to USEPA Fansteel CERCLA Info Request(3.12.21).pdf

Mr. Nixon:

Attached please find Kennametal Inc.'s response to U.S. EPA's CERCLA 104(e) information request regarding the Fansteel Metals site in Muskogee, Oklahoma. Per my prior correspondence, Kennametal is providing relevant documents in electronic format. The files are bates stamped and referenced accordingly in our response letter. You can download the files from the following Dropbox link (please let me know if you have any issues accessing the link):

<https://www.dropbox.com/sh/4j5eyxdhgwfn015/AACXkv8Q8AON24nQ5Zk1UuGBa?dl=0>

Best regards,
Seth

Seth A. Rice

Assistant General Counsel
Global Director of Ethics & Compliance; CCEP
seth.rice@kennametal.com
T +1 412 248 8210
M +1 412 841 2918
F +1 724 539 3839
Ethics Helpline: 1-877-781-7319

Kennametal Inc. | 525 William Penn Place Suite 3300 | Pittsburgh, PA 15219 | www.kennametal.com

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Message

From: Chintan Amin [chintan.amin@bayer.com]
Sent: 3/8/2021 12:04:13 AM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Site - HC Starck 104(e) Request

Good evening, Elizabeth - Thank you for your confirmation. I appreciate EPA's quick decision-making on this topic.

Best regards,

Chintan Amin

Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Friday, March 5, 2021 2:26 PM
To: Chintan Amin <chintan.amin@bayer.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Site - HC Starck 104(e) Request

Hello again Chintan,

I wanted to confirm in writing what I shared in a voicemail to you last week: at this time, Bayer is not obligated to respond to the CERCLA Section 104(e) information request it received from EPA on February 9, 2021.

Thank you,
Elizabeth

From: Pletan, Elizabeth
Sent: Monday, February 22, 2021 2:24 PM
To: Chintan Amin <chintan.amin@bayer.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Site - HC Starck 104(e) Request

Hi Chintan,

Thank you for checking in! You're right, we are still working on this question, and we appreciate you being cognizant of possible deadlines. I'll let you know as soon as possible what we find out and we'll keep in mind you may need an extension.

Thank you again,
Elizabeth

From: Chintan Amin <chintan.amin@bayer.com>
Sent: Monday, February 22, 2021 9:59 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Fansteel Site - HC Starck 104(e) Request

Hello Elizabeth,

I hope you were able to stay safe and warm last week and have your utilities back.

I am sure your review has been affected by the weather, so I am only writing to ensure that we do not miss any deadlines. As we discussed on the phone, HC Starck was an independent subsidiary of Bayer Corporation that was sold over a decade ago. If EPA determines it is directing the 104(e) request to Bayer Corporation, I may need to pull boxes from long term storage to review. In such a case, Bayer would be seeking an extension of the deadline in your original 104(e) request.

Best regards,

Chintan Amin
Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

-----Original Appointment-----

From: Chintan Amin
Sent: Tuesday, February 9, 2021 4:24 PM
To: Chintan Amin; 'Pletan, Elizabeth'
Cc: Nixon, Lance; Clarke, Angienell
Subject: Superfund Enforcement Assessment Section SEDAE US EPA
When: Friday, February 12, 2021 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Thanks for getting back to me. Hopefully this time on Friday still works. I think my questions are primarily legal in nature, but it may be helpful to have one of the project managers on because it may help me understand how the entities addressed in the letter were named.

Microsoft Teams meeting

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teams@pex-a.video.bayer.biz

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[+1 213-458-8486,536909948#](tel:+12134588486536909948) United States, Los Angeles

Phone Conference ID: 536 909 948#

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From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Sent: Tuesday, February 9, 2021 3:50 PM

To: Chintan Amin <chintan.amin@bayer.com>

Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Mr. Amin,

My apologies for missing your call earlier! I would be happy to set up a call to discuss the information request. I have cc'ed our Enforcement Officers Lance Nixon and Angienell Clark—it may be helpful to have them on the call. So far we have availability this Friday February 12 anytime except for 1:00 PM to 2:00 PM, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12:00 PM Central. My Thursday and Friday next week are currently blocked off but should open up in the next couple of days. Please let me know if any of those times will work for you and I will set up a Teams meeting.

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Chintan Amin <chintan.amin@bayer.com>
Sent: Tuesday, February 09, 2021 2:08 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

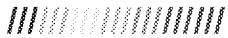
Dear Ms. Pletan,

I left a message regarding the attached Section 104(e) letter for your earlier today but with everybody being remote, I'm not sure if you've seen it. When you have a moment, would you let me know when you are available for a call to discuss? I would like to clarify the organization to whom it is addressed. Thank you.

Best regards,

Chintan Amin
Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



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100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

From: Christine Thomas <christine.thomas@bayer.com>
Sent: Tuesday, February 9, 2021 10:43 AM
To: Chintan Amin <chintan.amin@bayer.com>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Here you Chintan.

Thanks,
Christine

From: Nancy Hynson <nancy.hynson.ext@bayer.com>
Sent: Tuesday, February 9, 2021 10:41 AM
To: Christine Thomas <christine.thomas@bayer.com>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Hi Christine,

Here you go.

Nancy

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/5/2021 7:41:34 PM
To: Seth Rice [seth.rice@kennametal.com]
CC: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel Metals Site (Muskogee, OK): Kennametal Inc.

Hello Seth,

Thank you for confirming receipt of the Fansteel information request. We appreciate your willingness to share the documents electronically, as we at EPA are also still almost exclusively working from home. We agree that a file sharing service would be the best method for transferring the files. Once Kennametal shares access to the files with us, the files will be uploaded to EPA's internal Superfund document management system. Once the files are uploaded, Kennametal will be able to cease sharing access with us, but just wanted you to know that the uploading process may take a few days.

Please let me know if you have any additional questions! I'm not an IT expert for sure, but if we have any issues I will loop in the appropriate folks.

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Seth Rice <seth.rice@kennametal.com>
Sent: Monday, March 01, 2021 11:03 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: Fansteel Metals Site (Muskogee, OK): Kennametal Inc.

Good morning Elizabeth:

I'm reaching out to confirm that Kennametal Inc. received U.S. EPA's Region 6 CERCLA 104(e) information request letter regarding the Fansteel Metals site in Muskogee, Oklahoma (letter dated January 22, 2021). Please note that due to extended USPS mail delays and routing of mail within Kennametal due to COVID-19 remote working arrangements, we did not actually receive the letter at our headquarters until February 17, 2021. Accordingly, Kennametal's 30 day response deadline is March 19, 2021. We intend to reply on or before that date.

We do intend to include documents as attachments to our response letter. Can you clarify how EPA would like these documents shared electronically (e.g., ShareFile, CD, etc.) and to whom they should be sent? Our preference would be

to use a ShareFile-type method given the current remote working environment Kennametal (and perhaps EPA) is in currently; this is preferred over physical mailing of documents or media. Please advise.

Regards,
Seth

Seth A. Rice

Assistant General Counsel
Global Director of Ethics & Compliance; CCEP
seth.rice@kennametal.com

T +1 412 248 8210

M +1 412 841 2918

F +1 724 539 3839

Ethics Helpline: 1-877-781-7319

Kennametal Inc. | 525 William Penn Place Suite 3300 | Pittsburgh, PA 15219 | www.kennametal.com

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/5/2021 7:26:03 PM
To: Chintan Amin [chintan.amin@bayer.com]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Site - HC Starck 104(e) Request

Hello again Chintan,

I wanted to confirm in writing what I shared in a voicemail to you last week: at this time, Bayer is not obligated to respond to the CERCLA Section 104(e) information request it received from EPA on February 9, 2021.

Thank you,
Elizabeth

From: Pletan, Elizabeth
Sent: Monday, February 22, 2021 2:24 PM
To: Chintan Amin <chintan.amin@bayer.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Site - HC Starck 104(e) Request

Hi Chintan,

Thank you for checking in! You're right, we are still working on this question, and we appreciate you being cognizant of possible deadlines. I'll let you know as soon as possible what we find out and we'll keep in mind you may need an extension.

Thank you again,
Elizabeth

From: Chintan Amin <chintan.amin@bayer.com>
Sent: Monday, February 22, 2021 9:59 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Fansteel Site - HC Starck 104(e) Request

Hello Elizabeth,

I hope you were able to stay safe and warm last week and have your utilities back.

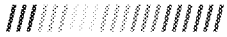
I am sure your review has been affected by the weather, so I am only writing to ensure that we do not miss any deadlines. As we discussed on the phone, HC Starck was an independent subsidiary of Bayer Corporation that was sold over a decade ago. If EPA determines it is directing the 104(e) request to Bayer Corporation, I may need to pull boxes from long term storage to review. In such a case, Bayer would be seeking an extension of the deadline in your original 104(e) request.

Best regards,

Chintan Amin
Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform

(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

-----Original Appointment-----

From: Chintan Amin

Sent: Tuesday, February 9, 2021 4:24 PM

To: Chintan Amin; 'Pletan, Elizabeth'

Cc: Nixon, Lance; Clarke, Angienell

Subject: Superfund Enforcement Assessment Section SEDAE US EPA

When: Friday, February 12, 2021 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).

Where: Microsoft Teams Meeting

Thanks for getting back to me. Hopefully this time on Friday still works. I think my questions are primarily legal in nature, but it may be helpful to have one of the project managers on because it may help me understand how the entities addressed in the letter were named.

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Join with a video conferencing device

teams@pex-a.video.bayer.biz

Video Conference ID: 123 910 307 7

[Alternate VTC dialing instructions](#)

Or call in (audio only)

[+1 213-458-8486, 536909948#](tel:+12134588486536909948) United States, Los Angeles

Phone Conference ID: 536 909 948#

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | [Meeting options](#)

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Sent: Tuesday, February 9, 2021 3:50 PM

To: Chintan Amin <chintan.amin@bayer.com>

Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Mr. Amin,

My apologies for missing your call earlier! I would be happy to set up a call to discuss the information request. I have cc'ed our Enforcement Officers Lance Nixon and Anginell Clark—it may be helpful to have them on the call. So far we have availability this Friday February 12 anytime except for 1:00 PM to 2:00 PM, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12:00 PM Central. My Thursday and Friday next week are currently blocked off but should open up in the next couple of days. Please let me know if any of those times will work for you and I will set up a Teams meeting.

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Chintan Amin <chintan.amin@bayer.com>
Sent: Tuesday, February 09, 2021 2:08 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Ms. Pletan,

I left a message regarding the attached Section 104(e) letter for your earlier today but with everybody being remote, I'm not sure if you've seen it. When you have a moment, would you let me know when you are available for a call to discuss? I would like to clarify the organization to whom it is addressed. Thank you.

Best regards,

Chintan Amin
Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com

Web: <http://www.bayer.us>

From: Christine Thomas <christine.thomas@bayer.com>
Sent: Tuesday, February 9, 2021 10:43 AM
To: Chintan Amin <chintan.amin@bayer.com>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Here you Chintan.

Thanks,
Christine

From: Nancy Hynson <nancy.hynson.ext@bayer.com>
Sent: Tuesday, February 9, 2021 10:41 AM
To: Christine Thomas <christine.thomas@bayer.com>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Hi Christine,

Here you go.

Nancy

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Message

From: John Hunt [jhunt@amg-nv.com]
Sent: 3/3/2021 9:01:25 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Thanks for the call back this afternoon. Please confirm that you received this email. I'll resend the letter if this makes it through.

Thanks
John

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Message

From: John Hunt [jhunt@amg-nv.com]
Sent: 3/3/2021 7:07:41 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401
Attachments: EPA Fansteel 030321.pdf

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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Message


From: Aselda.Thompson@shell.com [Aselda.Thompson@shell.com]
Sent: 3/3/2021 4:30:45 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel 104(e) information request

Much appreciated, Liz. We continue to review all available files but it would be at all possible to review the connection your contractor identified, that would greatly help us to focus our search. I understand if that's not possible.

Many thanks,

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, March 3, 2021 10:21 AM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hi again Aselda,

We approve your extension request, making the new due date April 10, 2021. In the next few days we'll provide you with letter memorializing the extension.

Thank you!
Elizabeth

From: Pletan, Elizabeth
Sent: Monday, March 01, 2021 4:06 PM
To: Aselda.Thompson@shell.com
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

Hi Aselda, just confirming receipt of your request. I'll bring it to my clients and let you know as soon as possible.

Thank you!
Elizabeth


From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 2:40 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

Thanks very much, Liz – that's helpful and I've passed along to the people doing the investigating for us. In the meantime, I'd like to formally request an extension of time to respond. We received the letter into our Houston mailroom on February 9th, so 30 days would put us at March 11th. While it's possible that we will have completed our search, I would like to request an additional 30 days to ensure we have the time to conduct a thorough search. Would EPA be able to approve an extension until April 10th?

Many thanks,

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Monday, March 1, 2021 12:30 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hi Aselda! Well it was definitely warmer this weekend thank goodness! I hope you had a good weekend too.

Please see attached two records we have that mention the entity referred to as "Billiton." We received these records in a response to a 104(e) request from the facility owner/operator, Fansteel Inc. Fansteel identified this entity as Billiton Trading Company, Inc. As I mentioned in my voicemail last week, our contractors did some preliminary corporate research and indicated that Billiton Trading Company, Inc. at some point merged with Shell Offshore Inc. In an effort to keep costs down, we did not request the analysis behind this preliminary determination. I'll talk to my clients to see if we can obtain the analysis to give you a better idea of the connection between Billiton and Shell. In the meantime, please let me know if these attached records help with Shell's research.

Sincerely,
Elizabeth

From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 11:48 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request

Hi Liz,

Hope you had a great weekend!

I'm working with my client groups to track down any information we may have to any of these entities and I'm hoping you might be able to provide what EPA believes to be the nexus or connection to Shell? That will help us direct our search.

Many thanks!

Aselda

From: Thompson, Aselda J SHLOIL-LSPT/EE
Sent: Wednesday, February 17, 2021 2:20 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request


Thanks for the response Liz – these are crazy times for Texas! It would be helpful to have an extension of time, and I'd also like to ask if you're able to provide any information or documents that demonstrate the nexus or connection of Shell to the site – this will definitely help us to search our records more efficiently.

Glad you hear you're all doing ok! We're in the same boat – glad to have power and water, at least for now.

Take care and we can talk when things calm down.

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 17, 2021 12:07 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Subject: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/3/2021 4:21:01 PM
To: Aselda.Thompson@shell.com
CC: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel 104(e) information request

Hi again Aselda,

We approve your extension request, making the new due date April 10, 2021. In the next few days we'll provide you with letter memorializing the extension.

Thank you!
Elizabeth

From: Pletan, Elizabeth
Sent: Monday, March 01, 2021 4:06 PM
To: Aselda.Thompson@shell.com
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

Hi Aselda, just confirming receipt of your request. I'll bring it to my clients and let you know as soon as possible.

Thank you!
Elizabeth


From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 2:40 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

Thanks very much, Liz – that's helpful and I've passed along to the people doing the investigating for us. In the meantime, I'd like to formally request an extension of time to respond. We received the letter into our Houston mailroom on February 9th, so 30 days would put us at March 11th. While it's possible that we will have completed our search, I would like to request an additional 30 days to ensure we have the time to conduct a thorough search. Would EPA be able to approve an extension until April 10th?

Many thanks,

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Monday, March 1, 2021 12:30 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

 Think Secure. This email is from an external source.

Hi Aselda! Well it was definitely warmer this weekend thank goodness! I hope you had a good weekend too.

Please see attached two records we have that mention the entity referred to as "Billiton." We received these records in a response to a 104(e) request from the facility owner/operator, Fansteel Inc. Fansteel identified this entity as Billiton Trading Company, Inc. As I mentioned in my voicemail last week, our contractors did some preliminary corporate research and indicated that Billiton Trading Company, Inc. at some point merged with Shell Offshore Inc. In an effort to keep costs down, we did not request the analysis behind this preliminary determination. I'll talk to my clients to see if we can obtain the analysis to give you a better idea of the connection between Billiton and Shell. In the meantime, please let me know if these attached records help with Shell's research.

Sincerely,
Elizabeth

From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 11:48 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request

Hi Liz,

Hope you had a great weekend!

I'm working with my client groups to track down any information we may have to any of these entities and I'm hoping you might be able to provide what EPA believes to be the nexus or connection to Shell? That will help us direct our search.

Many thanks!

Aselda

From: Thompson, Aselda J SHLOIL-LSPT/EE
Sent: Wednesday, February 17, 2021 2:20 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request


Thanks for the response Liz – these are crazy times for Texas! It would be helpful to have an extension of time, and I'd also like to ask if you're able to provide any information or documents that demonstrate the nexus or connection of Shell to the site – this will definitely help us to search our records more efficiently.

Glad you hear you're all doing ok! We're in the same boat – glad to have power and water, at least for now.

Take care and we can talk when things calm down.

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 17, 2021 12:07 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Subject: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next

week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 3/1/2021 10:05:42 PM
To: Aselda.Thompson@shell.com
CC: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel 104(e) information request

Hi Aselda, just confirming receipt of your request. I'll bring it to my clients and let you know as soon as possible.

Thank you!
Elizabeth


From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 2:40 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

Thanks very much, Liz – that's helpful and I've passed along to the people doing the investigating for us. In the meantime, I'd like to formally request an extension of time to respond. We received the letter into our Houston mailroom on February 9th, so 30 days would put us at March 11th. While it's possible that we will have completed our search, I would like to request an additional 30 days to ensure we have the time to conduct a thorough search. Would EPA be able to approve an extension until April 10th?

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To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: RE: Fansteel 104(e) information request

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Sincerely,
Elizabeth

From: Aselda.Thompson@shell.com <Aselda.Thompson@shell.com>
Sent: Monday, March 01, 2021 11:48 AM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: RE: Fansteel 104(e) information request

Hi Liz,

Hope you had a great weekend!

I'm working with my client groups to track down any information we may have to any of these entities and I'm hoping you might be able to provide what EPA believes to be the nexus or connection to Shell? That will help us direct our search.

Many thanks!

Aselda

From: Thompson, Aselda J SHLOIL-LSPT/EE

Sent: Wednesday, February 17, 2021 2:20 PM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: RE: Fansteel 104(e) information request

Thanks for the response Liz – these are crazy times for Texas! It would be helpful to have an extension of time, and I'd also like to ask if you're able to provide any information or documents that demonstrate the nexus or connection of Shell to the site – this will definitely help us to search our records more efficiently.

Glad you hear you're all doing ok! We're in the same boat – glad to have power and water, at least for now.

Take care and we can talk when things calm down.


Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Sent: Wednesday, February 17, 2021 12:07 PM

To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>

Subject: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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Message

From: Reed, Weslynn (WP) [WPreed@dow.com]
Sent: 3/1/2021 9:20:37 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth.

Weslynn Reed

Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Monday, March 1, 2021 2:44 PM
To: Reed, Weslynn (WP) <WPreed@dow.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Wes,

Please find attached a document showing a contractual relationship between Union Carbide and Fansteel.

Thank you,
Elizabeth

From: Reed, Weslynn (WP) <WPreed@dow.com>
Sent: Wednesday, February 24, 2021 5:56 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth. I appreciate the extension and look forward to reviewing the records.
Best regards,

Wes

Weslynn Reed

Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 24, 2021 4:34 PM
To: Reed, Weslynn (WP) <WPreed@dow.com>

Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: 104(e) Fansteel Metals Facility

Hello Weslynn,

Thank you again for your patience! This email serves as an extension of time for Union Carbide/Dow to reply to EPA's 104(e) information request. Based on the date you received the request, February 12, 2021, the new due date is April 13, 2021. We will also provide you with a written extension signed by my client.

We are still working on preparing some records to send to you; I'm hoping to provide them by the end of this week. The records show a "conversion" contract relationship between Union Carbide and Fansteel in the late 60's/early 70's pursuant to which Union Carbide provided raw material (tin slag) to Fansteel and Fansteel returned tantalum to Union Carbide.

Sincerely,
Elizabeth

From: Reed, Weslynn (WP) <WPReed@dow.com>

Sent: Friday, February 19, 2021 9:18 AM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth. There is no rush on our end. Stay safe and warm!

Wes

Weslynn Reed

Counsel — U.S. Operations, Regulatory and North America

The Dow Chemical Company

2211 H.H. Dow Way, Midland, MI 48674

Office: 989.496.1167

Cell: 989.423.5564

Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Sent: Thursday, February 18, 2021 4:07 PM

To: Reed, Weslynn (WP) <WPReed@dow.com>

Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel

United States Environmental Protection Agency, Region 6
(214) 665-8525

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe you have received this communication in error, please delete the copy you received, and do not print, copy, re-transmit, disseminate or otherwise use the information. Thank you.

From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



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1. Article Addressed to:

Corporation Service Company
For Valenita, LLC
251 Little Falls Drive
Wilmington, DE 19808



9590 9402 6146 0209 4900 30

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2501

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from Item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

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- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery over \$500

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
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- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9033

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- A receipt for this product
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- Electronic notification
- Delivery

- A record of delivery in
- signature if that is required
- for a specified period.

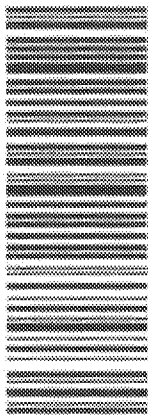
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- Insurance coverage is available for Certified Mail sent by Certified Mail service.

- Insurance coverage and insurance charges will be added to the cost of the mail.
- For an additional fee, we can provide you with a receipt for the mail.
- We will provide you with a receipt for the mail every business day.
- In request of a return receipt, we will send you a return receipt.
- For more information, visit us online at usps.com or call 1-800-ASK-USA.

2005, April 2005

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- ☐ Return Receipt (electronic) \$ _____
- ☐ Certified Mail Restricted Delivery \$ _____
- ☐ Adult Signature Required \$ _____
- ☐ Adult Signature Restricted Delivery \$ _____

Postage

Total Postage and Fees

Sent to _____

Business Day, A.M. or P.M.

City, State, ZIP+4®

PS Form 3800, April 2007

Postmark
Here

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, DE 19808

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEAS)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

SENDER: COMPLETE THIS SECTION

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- Print your name and address on the reverse so that we can return the card to you.
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1. Article Addressed to:

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, DE 19808



9590 9402 6146 0209 4902 07

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2433

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1?

☐ Yes

If YES, enter delivery address below:

☐ No

3. Service Type

☐ Adult Signature

☐ Adult Signature Restricted Delivery

☐ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Insured Mail

☐ Insured Mail Restricted Delivery (over \$500)

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Certified Mail

- Accept this portion of
- A return/receipt form
- Electronic verification of
- Identity
- A receipt of delivery that
- Signifies that the return
- Is in specified period.

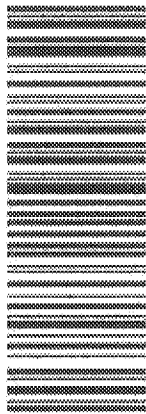
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- Certified Mail service is available for mail sent in the United States.
- Insurance coverage is available for Certified Mail sent with Certified Mail Restricted Delivery.
- Insurance coverage is available for Registered Mail sent with Registered Mail Restricted Delivery.
- For an additional fee, we can provide a return receipt for mail sent with Certified Mail, Registered Mail, or Priority Mail service.
- Return receipts are not provided for mail sent with Certified Mail, Registered Mail, or Priority Mail service.
- Return receipts are not provided for mail sent with Certified Mail, Registered Mail, or Priority Mail service.
- Return receipts are not provided for mail sent with Certified Mail, Registered Mail, or Priority Mail service.

1800, April 2016

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 8
1701 Elm Street, Suite 500
Dallas, Texas 75270

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\$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
\$	
Total Postage and Fees	
\$	
Sent to	
Street and Apt. No., or P.O. Box	
City, State, ZIP+4 [®]	
PS Form 3800, April 2013	

Postmark
Here

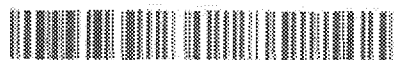
Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, DE 19808

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Corporate Service Company
for Philips Holding USA Inc.
251 Little Fall Drive
Wilmington, DE 19808



9590 9402 6146 0209 4902 14

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2471

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

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- * A receipt (this portion of the card) is provided for you.
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- * A record of delivery period is provided for a specified period.

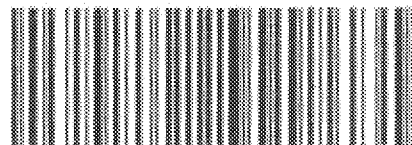
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- * For an additional fee, you may request an electronic return receipt.
- * Request service, or any other service, at the time of mailing the mailpiece. For a list of services, go to usps.com.

PSN 7530-02-000-9053

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

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Customer Use Only

Additional Services & Fees (Please print date and fee as appropriate)

<input type="checkbox"/> Return Receipt (hardcopy)	\$	
<input type="checkbox"/> Signature Required (hardcopy)	\$	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Insured Mail (beyond \$500)	\$	
<input type="checkbox"/> Registered Mail	\$	
<input type="checkbox"/> Signature Required (hardcopy)	\$	

Postmark
Month

Total Postage and Fees

Post to

Address and ZIP Code or PO Box

City, State, ZIP Code

Corporate Service Company
for Philips Holding USA Inc.
251 Little Fall Drive
Wilmington, DE 19808

PS Form 3800, March 2015

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1. Article Addressed to:

The Corporation Trust Company
For Metallurg, Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801



9590 9402 6146 0209 4902 69

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2440

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)

- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Certified Mail

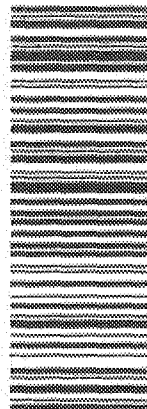
- A receipt that provides proof of mailing.
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Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
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<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
\$	
Total Postage and Fees	
\$	

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Here

Sent to _____
Street and Apt. No., or PO Box _____
City, State, ZIP+4® _____

The Corporation Trust Company
For Metallurg, Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

PS Form 3800, April 2015 Ed.

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1. Article Addressed to:

The Corporation Trust Company
For Shell Offshore Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801



9590 9402 6146 0209 4901 39

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2426

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- ☐ Agent
- ☐ Addressee

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C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

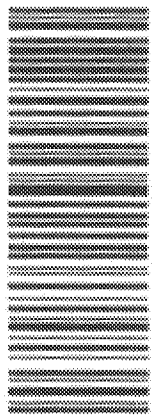
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- A receipt this portion of
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- Electronic verification of
- Delivery.
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- for a specified period.

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- For an additional fee, and
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- signature of the addressee).
- You can request a hard-copy
- electronic version for a
- complete PS Form 3811.
- A return address PS Form
- 3811, July 2015 PSN 7530-02-000-9053

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Extra Services & Fees (check box, and fee as appropriate)

- | | | |
|--|----|--|
| <input type="checkbox"/> Return Receipt (hardcopy) | \$ | |
| <input type="checkbox"/> Return Receipt (electronic) | \$ | |
| <input type="checkbox"/> Certified Mail Restricted Delivery | \$ | |
| <input type="checkbox"/> Adult Signature Required | \$ | |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$ | |

Postage

Total Postage and Fees

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252 MAG 2014

PS Form 3800, April 03

Postmark
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The Corporation Trust Company
For Shell Offshore Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 8
1201 Elm Street, Suite 500
Dallas, Texas 75270

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1. Article Addressed to:

Metallurg, Inc.
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087



9590 9402 6148 0209 4901 60

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2389

PS Form 3811, July 2015 PSN 7530-02-000-9053

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A. Signature

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☐ Agent

☐ Addressee

B. Received by (Printed Name)
C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

B. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

Certified Mail®

- A receipt this service is for
- A unique number for your
- Certificate verification of
- delivery

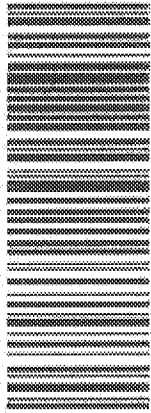
- A record of delivery for
- shipment that is retained
- for a specified period

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- Certified Mail® service is not
- insurable coverage is not
- available for
- Certified Mail® service
- of Certified Mail® service
- insurance coverage cannot
- include Priority Mail® items
- for an additional fee, mail
- items on the mail
- using service

- receipt service, a
- very limited by
- an agent's hand
- sole agent for a
- the PS Form 3811
- by which PS Form
- 3811, April 2015

CERTIFIED MAIL



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7020 0640 0000 9754 2369

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OFFICIAL USE

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Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$ _____
☐ Return Receipt (electronic) \$ _____
☐ Certified Mail Restricted Delivery \$ _____
☐ Adult Signature Required \$ _____
☐ Adult Signature Restricted Delivery \$ _____

Postage

Total Postage and Fees \$ _____

Post to

Street and Apt. No., or PO Box

City, State, ZIP+4[®]

Postmark
None

Metallurg, Inc.
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

PS Form 3800, April 2012

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEAS)
U.S. EPA Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Metallurg, Inc.
GFE Conversion
Heinz Schimmelbusch, CEO
435 Devon Park Drive Building 200
Wayne, Pennsylvania 19087



9590 9402 6146 0209 4900 47

2. Article Number (Transfer from sending label)

7020 0640 0000 9754 2334

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

Domestic Return Receipt

Certified Mail

- A receipt (this portion)
- A unique identifier for
- Electronic verification
- delivery.
- A record of delivery (a
- signature) used as future
- for a specified period.

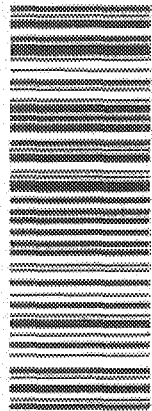
Important Requirements

- You may purchase Cert
- that only Mail® Mail
- or Priority Mail® service
- Certified Mail service is
- international mail.
- Insurance coverage is
- will be filed then only
- of limited third-party
- insurance coverage and
- certain liability shall be
- For an additional fee, or
- sold separately on the
- the following services:
- Return Receipt service
- in delivery product
- You can request a new
- electronic return for
- complete PS Form 38
- for more information, see

PS Form 3800, April 2015

Lance Nixon, Enforcement Officer
 Superfund Enforcement Assessment Section (SEAS)
 U.S. EPA, Region 6
 1201 Elm Street, Suite 600
 Dallas, Texas 75270

CERTIFIED MAIL



7020 0640 0000 9754 2334
 7020 0640 0000 9754 2334

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com™

OFFICIAL USE

Certified Mail Fee

Extra Services & Fees (check box, add fee as appropriate)

- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

Total Postage and

Basic Fee

Street and Apt. No.

City, State, ZIP+4®

PS Form 3800, 5/05

Metallurg, Inc.
 GFE Conversion
 Heinz Schimmelbusch, CEO
 435 Devon Park Drive Building 200
 Wayne, Pennsylvania 19087

Postmark
 Here

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Osram Sylvania Inc.
GTE - Sylvania
Michael Fieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887



9590 9402 6146 0209 4902 90

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2341

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Certified Mail

- A receipt (this portion of the label) is provided for you.
- A unique identifier is provided for each item.
- Electronic verification of delivery.

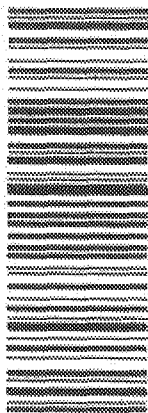
- A record of delivery time and date is maintained for a specified period.

Important Reminders:

- You may include Certified Mail with First-Class Mail®, First-Class Mail® International®, or Priority Mail® services.
- Certified Mail service is not available for bulk mail.
- Insurance coverage is available for Certified Mail service.
- Certified Mail service is not available for mail sent to destinations outside the United States.
- Certified Mail service is not available for mail sent to destinations outside the United States.
- Certified Mail service is not available for mail sent to destinations outside the United States.
- Certified Mail service is not available for mail sent to destinations outside the United States.
- Certified Mail service is not available for mail sent to destinations outside the United States.

Jan. 2003, April 2003

CERTIFIED MAIL



7020 0640 0000 9754 2341
7020 0640 0000 9754 2341

U.S. Postal Service[™]
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee

- ☐ Extra Services & Fees (check box, add fee as appropriate)
- ☐ Return Receipt (hardcopy) \$
- ☐ Return Receipt (electronic) \$
- ☐ Certified Mail Restricted Delivery \$
- ☐ Adult Signature Required \$
- ☐ Adult Signature Restricted Delivery \$

Postage

Total Postage and Fees \$

Sent to

Street and Apt. No., or PO

City, State, ZIP+4[®]

PS Form 3800, April 2011

Postmark
Here

Oscar Sylvania Inc.
GTE - Sylvania
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

E T Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, NY 10005



9590 9402 6146 0209 4902 21

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2495

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery over \$500 | |

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Certified Mail

- A receipt (this postcard)
- A return receipt for it
- Exclusive tracking of delivery

- A record of delivery and signature that is retained for a specified period.

Important Reminders:

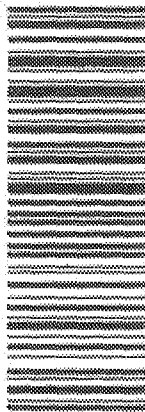
- You may purchase Certified Mail at any Post Office, or by phone, mail, or online.
- Certified Mail service is not available for certain mailpieces.

- Insurance coverage is not available for Certified Mail service.
- Certified Mail service is not available for certain mailpieces.

- Certified Mail service is not available for certain mailpieces.
- Certified Mail service is not available for certain mailpieces.

PS Form 3811, July 2015 PSN 7530-02-000-9053

CERTIFIED MAIL



7020 0640 0000 9754 2495
7020 0640 0000 9754 2495

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEAS)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$

Postmark
Here

Postage	
\$	
Total Postage and Fees	
\$	
Sent To	
Street and Apt. No., or PO Box No.	
City, State, ZIP+4®	

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, NY 10005

PS Form 3800, April 2007 (Rev. 7-2005) 5010-108-000-9001

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207



9590 9402 6146 0209 4902 38

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2486

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY
A. Signature

X

- ☐ Agent
- ☐ Addressee

B. Received by (Printed Name)
C. Date of Delivery

- D. Is delivery address different from item 1?** ☐ Yes
- If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Certified Mail

- * A receipt (this form) is provided to you.
- * A unique identifier for you.
- * Electronic verification of delivery.
- * A record of delivery (with signature) that is retained for a specified period.

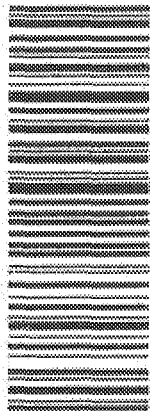
Important Reminders:

- * You may purchase Certified Mail, Registered Mail, or Priority Mail® service.
- * Certified Mail service is restricted mail.
- * Insurance coverage is a feature of Certified Mail service.
- * Insurance coverage is not available for Priority Mail items.

* In addition, an amount for the cost of the service is added to the delivery charge. Delivery charges are subject to change without notice. Delivery charges for Priority Mail items can be found on the PS Form 3811, July 2015 PSN 7530-02-000-9053.

* PSN 7530-02-000-9053

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEAS)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

[illegible]

00000000000000000000

**U.S. Postal Service™
CERTIFIED MAIL® RECEIPT**

Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Castles Next Door

Care Services & Fees *(see box, left for appropriate)*

☐ **Domestic Product** \$

☐ Return Receipt (optional) ☐ _____☐ Certified Mail® Registered Delivery \$_____

☐ Adult Signature Required \$.....

☐ Adult Signature Restricted Delivery \$

Notes

12

Added Postage and Fees

10

Start To

2007/06/25

Byfile and Apt. No. of M.

1. *Chlorophyll a* (Chl *a*)

[illegible]

.....

RS Form 3800, April 2011

Corporation Service Company
For Everzine USA Inc.
80 State Street
Albany, New York 12207

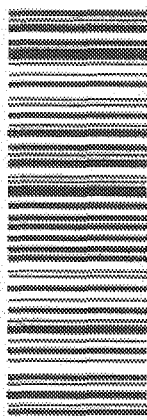
Postmark
class

IRS Form 990, April 2018

RESEARCH DESIGN

Lance Nixon, Enforcement Officer
 Superfund Enforcement Assessment Section (SEAS)
 U.S. EPA, Region 6
 1201 Elm Street, Suite 500
 Dallas, Texas 75270

CERTIFIED MAIL



7020 0640 0000 9754 2464
 7020 0640 0000 9754 2464

U.S. Postal Service[™]
CERTIFIED MAIL[®] RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com.

OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees, check box, add fee as appropriate	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
\$	
Total Postage and Fees	
\$	

Postmark
 Here

Sent to _____
 Attention/Dept./Box, if POB _____
 City/State/Zip+4 _____
 PS Form 3800, July 2002

Corporation Service Company
 For Bayer Corporation
 135 N. Pennsylvania Street, Suite 1610
 Indianapolis, IN 46204

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

Corporate Creations Network Inc.
For Ogram Sylvania Inc.
3411 Silverside Road
Tatnell Building Suite 104
Wilmington, DE 19810



9590 9402 6146 0209 4902 52

7020 0640 0000 9754 2457

A. Signature

X

 Agent

☐ Address

B. Received by Printed Name:

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

☐ Adult Signature
☐ Adult Signature Restricted Delivery
☐ Certified Mail®
☐ Certified Mail Restricted Delivery
☐ Collect on Delivery
☐ Collect on Delivery Restricted Delivery
☐ Insured Mail
☐ Insured Mail Restricted Delivery
 (over \$500)

☐ Priority Mail Express®

© Registered Name

© Registered Mail Restricted Delivery

☐ Return Receipt for Merchandise

☐ Signature Confirmation™

☐ Signature Confirmation
Restricted Delivery

PS Form 3811, July 2016 PSN 7530-02-000-9052

Domestic Return Receipt

Certified Mail

© 1999 by The McGraw-Hill Companies, Inc.

• A record of delivery (proof of delivery) that is returned to a shipper's company.

Important Reminders:

100% Cotton
 100% Cotton
 100% Cotton

100

100

of Communist China, and the

THE

25

1000

100

1000

11

Lance Nixon, Enforcement Officer
 Superfund Enforcement Assessment Section (SEDA)
 U.S. EPA, Region 6
 1720 Elm Street, Suite 510
 Dallas, Texas 75276

VERIFIED MAIL



7020 0640 0000 9754 2457
 7020 0640 0000 9754 2457

U.S. Postal Service[®]
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com.

OFFICIAL USE

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

☐ Return Receipt (hardcopy)

☐ Return Receipt (electronic)

☐ Certified Mail Restricted Delivery

☐ Adult Signature Required

☐ Adult Signature Restricted Delivery

Postage

\$

Total Postage and Fees

\$

Sent To

Street and Apt. No., or P.O. Box

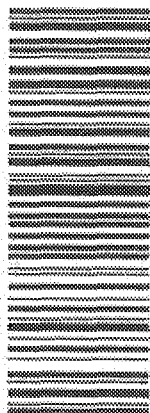
City, State, ZIP+4[®]

PS Form 3800, April 2010

Postmark
 Here

Corporate Creations Network Inc.
 For Osram Sylvania Inc.
 3411 Silverside Road
 Tatnall Building Suite 104
 Wilmington, DE 19810

CERTIFIED MAIL



7020 0640 0000 9754 2419
7020 0640 0000 9754 2419

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEAS)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

U.S. Postal ServiceTM
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com.

OFFICIAL USE

Certified Mail Fee

☐ First-class postage & fee (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$

Postage

\$
Total Postage and Fees

Sent To

Street and Apt. No., or PO Box
City, State, ZIP+4[®]

Valenite, LLC
Valeron Metals
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Postmark
Here

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983



9590 9402 6146 0209 4901 84

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2402

PS Form 3811, July 2015 PSN 7530-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- ☐ Adult Signature
- ☐ Adult Signature Restricted Delivery
- ☐ Certified Mail®
- ☐ Certified Mail Restricted Delivery
- ☐ Collect on Delivery
- ☐ Collect on Delivery Restricted Delivery
- ☐ Insured Mail
- ☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®
- ☐ Registered Mail™
- ☐ Registered Mail Restricted Delivery
- ☐ Return Receipt for Merchandise
- ☐ Signature Confirmation™
- ☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

Certified Mail

- A receipt that confirms delivery
- A unique identifier for tracking
- Electronic verification of delivery

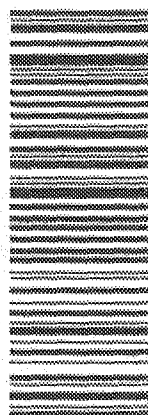
■ A record of delivery for signature that is retained for a specified period

Important Reminders

- You may indicate that you want "first-class mail" or "priority mail" service.
- Certified Mail service is not available for international mail.
- Insurance coverage is available for Certified Mail sent by First-Class Mail or Priority Mail.
- Insurance coverage and return money limit the amount of money that the sender can receive for a lost or damaged item.
- Additional fee is required for the return receipt service.
- Return receipt must always accompany mail that has a return receipt.
- Return receipt, PS Form 3811, must be attached to the mailpiece.

3811, April 2015

CERTIFIED MAIL



7020 0640 0000 9754 2402
7020 0640 0000 9754 2402

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

U.S. Postal ServiceTM
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee \$
Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$
☐ Return Receipt (electronic) \$
☐ Certified Mail Restricted Delivery \$
☐ Adult Signature Required \$
☐ Adult Signature Restricted Delivery \$
Postage \$
Total Postage and Fees \$

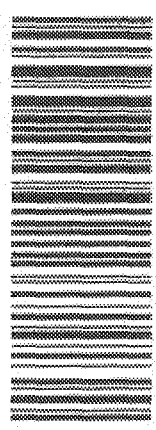
Postmark
Here

Sent To
Special Agent in Charge, U.S. EPA
City, State, ZIP+4[®]

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

PS Form 3800, April 2002

CERTIFIED MAIL



7020 0640 0000 9754 2396
7020 0640 0000 9754 2396

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

U.S. Postal Service[®]
CERTIFIED MAIL[®] RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee	
* Sign Certificate & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$ _____
<input type="checkbox"/> Return Receipt (electronic)	\$ _____
<input type="checkbox"/> Certified Mail Restricted Delivery	\$ _____
<input type="checkbox"/> Adult Signature Required	\$ _____
<input type="checkbox"/> Adult Signature Restricted Delivery	\$ _____
Postage	
\$ _____	
Total Postage and Fees	
\$ _____	
Sent To	
Street and Apt. No., or PO Box	
City, State, ZIP+4 [®]	

Postmark Here

Everzinc USA Inc.
Sogem Corporation - Noreore Division
Vincent Dujardin, CEO
3717 National Drive, Suite 105
Raleigh, North Carolina 27612

PS Form 3800, April 2015

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Amalgamet, Inc.
Amalgamet-Finamines
Hamish Michie, CEO
222 Bloomingdale Road, Suite 101
White Plains, New York 10605



9590 9402 6146 0209 4901 22

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2310

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

Certified Mail

- A receipt this portion of
- A unique identifier for the
- Electronic verification of
- delivery.

■ A record of delivery that

■ attached to this is required

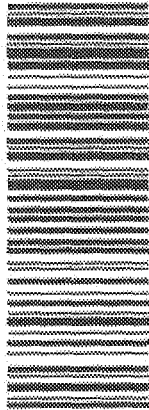
■ for a guaranteed period.

Important Reminders:

- You may purchase Certified Mail, Certified Mail Restricted Delivery, or Priority Mail service.
- Certified Mail service is a
- international mail.
- Insurance coverage is not
- with Certified Mail service.
- of Certified Mail service is
- must each envelope with
- priority Mail for Mail Piece
- For an additional fee, mail
- under return on the mail
- the following services:
- Return receipt service.
- of delivery (including the
- You can request a hard
- electronic version. For a
- complete PS Form 3811
- (back), attach PS Form
- 3811 from 3800, and scan

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

CERTIFIED MAIL



7020 0640 0000 9754 2310
7020 0640 0000 9754 2310

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®

OFFICIAL USE

Certified Mail Fee

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$ _____
☐ Return Receipt (electronic) \$ _____
☐ Certified Mail Restricted Delivery \$ _____
☐ Adult Signature Required \$ _____
☐ Adult Signature Restricted Delivery \$ _____

Postage

Total Postage and F

Start to

Street and Apt. No.,

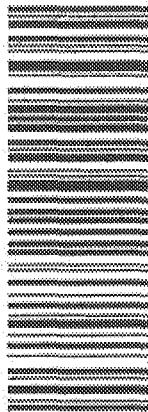
City, State, ZIP+4®

PS Form 3800, Apr.

Postmark
Here

Amalgamet, Inc.
Amalgamet-Finamines
Hamish Michie, CEO
222 Bloomingdale Road, Suite 101
White Plains, New York 10605

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEAS)
U.S. EPA, Region 6
1200 Elm Street, Suite 500
Dallas, Texas 75270



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OFFICIAL USE

Continued Next Page

East: \$60000 & 1000, check box, add too as appropriate

☐ Return Receipt (Inventory) ☐

☐ Please, Receipt (Electronic) ☐

☐ Certified Mail Restricted Delivery \$.....

☐ **Value Signature Required**

☐ Adult Signature Restricted Delivery S:

Page

3	Total Postage and Fees	
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1. The first step is to identify the problem or question that needs to be answered. This involves understanding the context and the specific requirements of the task.

.....

54376 73

Sheet and Box No. of P.

On 28th Nov

Philips Holding USA Inc.
For Philips North America LLC
Macro Electra
Vitor Rocha, CEO
222 Jacobs Street, 3rd Floor
Cambridge, Massachusetts 02141

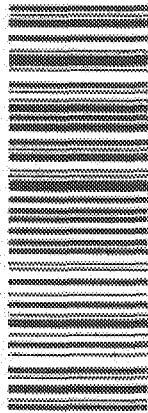
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FD-302a (Rev. 4-15-64)

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Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEAS)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

7020 0640 0000 9754 2365



7020 0640 0000 9754 2365
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OFFICIAL USE

Certified Mail Fee	
\$	
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input type="checkbox"/> Return Receipt (electronic)	\$
<input type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	
\$	
Total Postage and Fees	
\$	

Postmark
Here

Sent to
Street and Apt. No., or P.O.
City, State, ZIP+4®

Kennametal Inc.
Christopher Rossi, President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

PS Form 3800, April 03

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Bayer Corporation
Hermann C. Stark, Inc.
Philip Blake, President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981



9590 9402 6148 0209 4902 83

2. Article Number (Transfer from sorting label)

7020 0640 0000 9754 2356

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent

☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type

- | | |
|--|---|
| <input type="checkbox"/> Adult Signature | <input type="checkbox"/> Priority Mail Express® |
| <input type="checkbox"/> Adult Signature Restricted Delivery | <input type="checkbox"/> Registered Mail™ |
| <input type="checkbox"/> Certified Mail® | <input type="checkbox"/> Registered Mail Restricted Delivery |
| <input type="checkbox"/> Certified Mail Restricted Delivery | <input type="checkbox"/> Return Receipt for Merchandise |
| <input type="checkbox"/> Collect on Delivery | <input type="checkbox"/> Signature Confirmation™ |
| <input type="checkbox"/> Collect on Delivery Restricted Delivery | <input type="checkbox"/> Signature Confirmation Restricted Delivery |
| <input type="checkbox"/> Insured Mail | |
| <input type="checkbox"/> Insured Mail Restricted Delivery (over \$500) | |

PS Form 3811, July 2015 PSN 7530-02-000-9053

Domestic Return Receipt

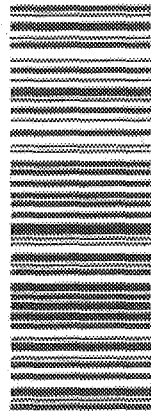
Certified Mail

- A receipt (see bottom of card)
- A unique identifier for the mailpiece
- Electronic verification of delivery
- A record of delivery (see signature card) is required for its specified period.
- Important Restrictions:**
 - You may purchase Certified Mail only with First-Class Mail® or Priority Mail® service.
 - Certified Mail service is not available for international mail.
 - Insurance coverage is not available for Certified Mail service.
 - Certified Mail service is not available for certain Priority Mail® flat rate boxes.
 - For an additional fee, an electronic receipt will be provided on the internet.
 - Delivery services include restricted delivery, return receipt, and signature confirmation.
 - For item number 1, the electronic receipt is not available for items that require a signature.
 - For item number 2, the electronic receipt is not available for items that require a signature.

PSN 7530-02-000-9053

Lance Nixon, Enforcement Officer
 Superfund Enforcement Assessment Section (SEDA)
 U.S. EPA, Region 8
 1201 Elm Street, Suite 500
 Dallas, Texas 75270

CERTIFIED MAIL



7020 0640 0000 9754 2358
 7020 0640 0000 9754 2358

U.S. Postal Service®
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OFFICIAL USE

Postmark: _____

Postage: _____

Domestic Mail Fee: _____

U.S. Service & Fees (Other fees, and fee an appropriate)

☐ Return Receipt (hardcopy) \$ _____

☐ Return Receipt (electronic) \$ _____

☐ Signature Required Delivery \$ _____

☐ Certified Mail Restricted Delivery \$ _____

☐ Adult Signature Required \$ _____

☐ Restricted Signature Required Delivery \$ _____

Postage and Fees: _____

Send To: _____

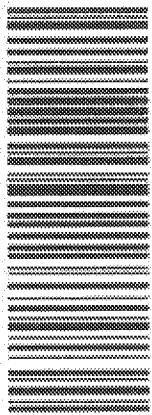
Street and Apt. No., or P.O. Box: _____

City, State, ZIP+4®: _____

U.S. Postnet 9500 4501 20

**Bayer Corporation
 Hermann G. Stark, Inc.
 Philip Blake, President and CEO
 1110 Bayer Boulevard
 Whippany, New Jersey 07981**

CERTIFIED MAIL



7020 0640 0000 9754 2327
7020 0640 0000 9754 2327

Lance Nixon, Enforcement Officer
Superfund Enforcement Assessment Section (SEDAE)
U.S. EPA, Region 6
1201 Elm Street, Suite 500
Dallas, Texas 75270

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CERTIFIED MAIL[®] RECEIPT
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For delivery information, visit our website at www.usps.com

OFFICIAL USE

Certified Mail Fee

Extra Services & Fees (check box, add fee as appropriate)
☐ Return Receipt (hardcopy) \$ _____
☐ Return Receipt (electronic) \$ _____
☐ Certified Mail Restricted Delivery \$ _____
☐ Adult Signature Required \$ _____
☐ Adult Signature Restricted Delivery \$ _____

Postage

Total Postage and Fees \$ _____

Sent To _____

Street and Apt. No., or PO _____

City, State, ZIP+4[®] _____

Shell Offshore Inc.
Billiton Trading Co. - Thailand Smelting
Richard H. Tallant, CEO
150 N. Dairy Ashford Road
Houston, Texas 77079

Postmark
Here

PS Form 3800, April 2011

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Shell Offshore Inc.
Bilbition Trading Co. - Thailand Smelting
Richard H. Tallant, CEO
150 N. Dairy Ashford Road
Houston, Texas 77079



9590 8402 6146 0209 4801 46

2. Article Number (Transfer from service label)

7020 0640 0000 9754 2322

PS Form 3811, July 2015 PSN 7580-02-000-9053

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Address

B. Received by (Printed Name)

C. Date of Delivery	
---------------------	--

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

☐ Yes

☐ No

3. Service Type

☐ Adult Signature☐ Adult Signature Restricted Delivery

☐ Certified Mail®

☐ Certified Mail Restricted Delivery☐ Collect on Delivery☐ Collect on Delivery Restricted Delivery
☐ Insured \$5000

☐ Insured Risk
☐ Investment & Cost

☐ Insured Mail Restricted Delivery
from \$50.00

1. Introduction

☐ Priority Mail Express®

Registered Mail[®]

☐ Registered Mail Restricted

Delivery

☐ Return Receipt for
Expenditure of Funds

Abstract

☐ Signature Confirmation

Signature: _____
Restricted Delivery

Physical Therapy

Certified Mail®
As a special extra service of the U.S. Postal Service, Certified Mail® provides the recipient with a receipt and a record of the item's delivery. It's the only way to be sure that your letter, package or document has been received by the intended recipient. It's also the only way to prove that you've sent it. Certified Mail is available for all mail classes, including First Class Mail, Registered Mail, Priority Mail, Registered Mail, Return Receipt, and Certified Mail. It's the only way to be sure that your letter, package or document has been received by the intended recipient. It's also the only way to prove that you've sent it. Certified Mail is available for all mail classes, including First Class Mail, Registered Mail, Priority Mail, Registered Mail, Return Receipt, and Certified Mail.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2426

The Corporation Trust Company
For Shell Offshore Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Shell Offshore Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

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For Osram Sylvania Inc.
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Philip Blake
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Whippany, New Jersey 07981

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Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2433

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Cabot Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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White Plains, New York 10605

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For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
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Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

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Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
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435 Devon Park Drive
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Wayne, Pennsylvania 19087

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Fair Lawn, New Jersey 07410

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For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2440

The Corporation Trust Company
For Metallurg, Inc.
Corporation Trust Center
1209 Orange Street
Wilmington, DE 19801

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

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The following definitions shall apply to the following words as they appear in this enclosure:

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2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2457

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Building Suite 104
Wilmington, DE 19810

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

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**SUSAN
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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2464

Corporation Service Company
For Bayer Corporation
135 N. Pennsylvania Street, Suite 1610
Indianapolis, IN 46204

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Bayer Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
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10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
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19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2471

Corporate Service Company
For Philips Holding USA Inc.
251 Little Fall Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Philips Holding USA Inc. For Philips North America LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
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 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
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 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
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For Osram Sylvania Inc.
3411 Silverside Road
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Philip Blake
President and CEO
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Whippany, New Jersey 07981

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Indianapolis, Indiana 46204

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Christopher Rossi
President and CEO
525 William Penn Place
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for Philips North America LLC
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Vitor Rocha, CEO
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Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

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80 State Street
Albany, New York 12207

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7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

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(FKAValeron Metals)
Richard Askin, Manager
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Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2488

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Everzinc USA Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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The following definitions shall apply to the following words as they appear in this enclosure:

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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2495

C T Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, NY 10005

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Union Carbide Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

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Sincerely yours,

**SUSAN
WEBSTER**

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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2501

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, DE 19808

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Valenite, LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
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9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
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19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
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22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
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Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

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135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2310

Amalgamet, Inc.
Amalgamet-Finamines
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Amalgamet, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
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6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
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 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
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 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
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ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

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(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
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White Plains, New York 10605

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Richard H. Tallant, CEO
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For Shell Offshore Inc.
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Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
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Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
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Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
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Wilmington, Delaware 19801

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Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2327

Shell Offshore Inc.
Billiton Trading Co. - Thailand Smelting
Richard H. Tallant, CEO
150 N. Dairy Ashford Road
Houston, Texas 77079

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Shell Offshore Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

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The following definitions shall apply to the following words as they appear in this enclosure:

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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2334

Metallurg, Inc.
GFE Conversion
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
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Susan D. Webster, Chief
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Enclosures (4)

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FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2341

Osram Sylvania Inc.
GTE - Sylvania
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Osram Sylvania Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
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16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2358

Bayer Corporation
Hermann C. Stark, Inc.
Philip Blake, President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Bayer Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
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 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
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Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
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Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
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For Osram Sylvania Inc.
3411 Silverside Road
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Philip Blake
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100 Bayer Boulevard
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Christopher Rossi
President and CEO
525 William Penn Place
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for Philips North America LLC
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Vitor Rocha, CEO
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3rd Floor
Cambridge, Massachusetts 02141

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Everzinc USA Inc.
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Vincent Dujardin, CEO
3717 National Drive
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Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

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7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
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Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2365

Kennametal Inc.
Christopher Rossi, President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Kennametal Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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The following definitions shall apply to the following words as they appear in this enclosure:

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3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2372

Philips Holding USA Inc.
For Philips North America LLC
Mepco Electra
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Philips Holding USA Inc. For Philips North America LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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**SUSAN
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Susan D. Webster, Chief
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Enclosures (4)

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FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

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4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2389

Metallurg, Inc.
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Metallurg, Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
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Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
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9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
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16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
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18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKA Valeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2396

Everzinc USA Inc.
Sogem Corporation - Norore Division
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Everzinc USA Inc. (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
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 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
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 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
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 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

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For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

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(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
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Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

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for Philips North America LLC
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Vitor Rocha, CEO
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3rd Floor
Cambridge, Massachusetts 02141

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For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2402

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Union Carbide Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Lance Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and definitions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Lance Nixon at (214) 665-2203. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Pletan, at (214) 665-8525. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=68001003655400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
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6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
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The following definitions shall apply to the following words as they appear in this enclosure:

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2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST

URGENT LEGAL MATTER: PROMPT REPLY REQUESTED

CERTIFIED MAIL, RETURN RECEIPT REQUESTED #7020 0640 0000 9754 2419

Valenite, LLC
Valeron Metals
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Valenite, LLC (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

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Sincerely yours,

**SUSAN
WEBSTER**

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Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
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Enclosures (4)

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2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term “Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term “RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term “Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term “Respondent” shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. [Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term “Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term “TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term “Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term “Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Gerry Caron [gerry.caron@cabotcorp.com]
Sent: 2/4/2021 11:16:16 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Thursday, February 4, 2021 4:32 PM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
I have submitted your request for an extension to my management. I'll be in touch as soon as hear back.
Thank you for your cooperation.

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.Elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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Message

From: Webster, Susan [webster.susan@epa.gov]
Sent: 2/4/2021 9:40:28 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Johnson, Lydia [johnson.lydia@epa.gov]; Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

I approve per a discussion with Lydia. Tx u. susan

Susan D. Webster, Chief

Assessment and Enforcement Branch (SEDA)

U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202
Office: 214.665.6784
Cell: 214.789.2667
webster.susan@epa.gov

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Thursday, February 04, 2021 3:05 PM
To: Webster, Susan <webster.susan@epa.gov>
Cc: Johnson, Lydia <johnson.lydia@epa.gov>; Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Susan,
Cabot Corporation, a recipient of a 104e for Fansteel, has requested a 30 day extension to respond to the request. Your approval of this request will make the response due April 5, 2021. If you approve, I will draft an extension letter for your signature.
Thanks
-Lance

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Thursday, February 4, 2021 2:43 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM

To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,

Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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Message

From: Gerry Caron [gerry.caron@cabotcorp.com]
Sent: 2/4/2021 8:42:41 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
CC: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. It appears to me that it will take us additional time beyond the 30 days to conduct internal record checks, etc. to respond properly to EPA's information request, particularly given how far back in time the request and information relate to. I would like to request an additional 30 days for Cabot to respond to EPA's request. Can you please confirm if such an extension is acceptable to the agency?

Thanks, Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,

Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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Message

From: Tina Chiappetta - LR [christina.chiappetta@gsa.gov]
Sent: 2/25/2021 10:18:41 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]; Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Katharine Healy - LR [katharine.healy@gsa.gov]
Subject: Section 104e Request: Fansteel
Attachments: Fansteel Response .pdf; ExhibitA.pressrelease.pdf; ExhibitB.depotlist.pdf; ExhibitC.Determinations.pdf; ExhibitD.recordstransfer.pdf

Good afternoon,

Attached is GSA's response to your request for information relating to Fansteel Metals.

Please let us know if you have questions.

Thanks,

Tina Chiappetta
Real Property Division
Office of General Counsel
General Services Administration
1800 F Street NW, Room 2019
Washington, DC 20405
Tel.: 202 969 4102
Cell: 202 258 8626

CONFIDENTIALITY NOTICE:

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Message

From: Reed, Weslynn (WP) [WPreed@dow.com]
Sent: 2/24/2021 11:55:36 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth. I appreciate the extension and look forward to reviewing the records.
Best regards,

Wes

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 24, 2021 4:34 PM
To: Reed, Weslynn (WP) <WPreed@dow.com>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Weslynn,

Thank you again for your patience! This email serves as an extension of time for Union Carbide/Dow to reply to EPA's 104(e) information request. Based on the date you received the request, February 12, 2021, the new due date is April 13, 2021. We will also provide you with a written extension signed by my client.

We are still working on preparing some records to send to you; I'm hoping to provide them by the end of this week. The records show a "conversion" contract relationship between Union Carbide and Fansteel in the late 60's/early 70's pursuant to which Union Carbide provided raw material (tin slag) to Fansteel and Fansteel returned tantalum to Union Carbide.

Sincerely,
Elizabeth

From: Reed, Weslynn (WP) <WPreed@dow.com>
Sent: Friday, February 19, 2021 9:18 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth. There is no rush on our end. Stay safe and warm!

Wes

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 4:07 PM
To: Reed, Weslynn (WP) <WPreed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe you have received this communication in error, please delete the copy you received, and do not print, copy, re-transmit, disseminate or otherwise use the information. Thank you.

From: Reed, Weslynn (WP) <WPreed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,
I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed
Counsel -- U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 2/24/2021 9:33:59 PM
To: Reed, Weslynn (WP) [WPReed@dow.com]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility

Hello Weslynn,

Thank you again for your patience! This email serves as an extension of time for Union Carbide/Dow to reply to EPA's 104(e) information request. Based on the date you received the request, February 12, 2021, the new due date is April 13, 2021. We will also provide you with a written extension signed by my client.

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Sincerely,
Elizabeth

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Sent: Friday, February 19, 2021 9:18 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Thank you, Elizabeth. There is no rush on our end. Stay safe and warm!

Wes

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 4:07 PM
To: Reed, Weslynn (WP) <WPReed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,

Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed
Counsel — U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 2/24/2021 4:17:30 PM
To: Steger, Mark J. [msteger@clarkhill.com]; Gladstein, Richard (ENRD) [Richard.Gladstein@usdoj.gov]; Averbach, Andrew [Andrew.Averbach@nrc.gov]; England, Christina [Christina.England@nrc.gov]; Pam Dizikes [Pam.Dizikes@deq.ok.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: CERCLA 104(e) letter
Attachments: 2021 02 01 Cabot 104e.pdf; 2021 02 01 Fansteel Metals 104(e) Information Request email Cabot.pdf

Hello all,

Per your request during our February 19 call, I have attached an example of the 104(e) information requests that EPA R6 sent out on February 1, 2021. Attachment 4 includes a list of recipients.

Thank you,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

NOTICE: This communication may contain privileged or other confidential information. If you are not the intended recipient, or believe you have received this communication in error, please delete the copy you received, and do not print, copy, re-transmit, disseminate or otherwise use the information. Thank you.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

January 22, 2021

CERCLA 104(e) INFORMATION REQUEST
URGENT LEGAL MATTER: PROMPT REPLY REQUESTED
VIA ELECTRONIC MAIL

Cabot Corporation
Sean D. Keohane, President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210
karen.kalita@cabotcorp.com

Re: Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Dear Sir/Madam:

The U.S. Environmental Protection Agency (EPA) understands that Cabot Corporation (Respondent) has/had a contractual relationship with Fansteel Metals Inc. EPA seeks cooperation from Respondent in providing information and documents relating to the Fansteel Metals Facility (the "Site") in Muskogee, Oklahoma. Obtained information will aid the EPA in its investigation of the release or threat of release of certain hazardous substances, pollutants or contaminants at this Site. Your response will also help the EPA develop a better understanding of activities that occurred at the Site.

This information request is not a determination that Respondent is responsible or potentially responsible for contamination that occurred at the Site. The EPA is sending this letter as part of its investigation of the Site and does not expect you to pay for or perform any Site-related activities at this time. If the EPA determines that you are responsible or potentially responsible for response activities at the Site, you will receive a separate letter clearly stating such a determination as well as the EPA's basis for such determination.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(e), 42 U.S.C. § 9604(e), gives the EPA the authority to require the respondent to respond to this information request (see Enclosure 1). We encourage you to give this matter your full attention, and we respectfully request you to respond to this request for information within thirty (30) days of receipt of this letter. You may designate another official with the requisite authority to respond on your behalf. However, failure to respond to this information request may result in the EPA seeking penalties of up to \$58,328 per day of violation. In addition, furnishing false, fictitious or fraudulent statements or representations is subject to criminal penalty under 18 U.S.C. § 1001.

Please provide a written response to Mr. Grace Nixon, Enforcement Officer, at the address included in the Information Request. Please refer to Enclosure 2 for important instructions and questions and Enclosure 3 for specific questions that require your response to this Information Request.

If you have any questions regarding this letter, contact Mr. Grace Nixon at (214) 992-3303. For legal questions concerning this letter, please have your legal counsel contact Ms. Elizabeth Blesau, at (214) 992-8252. Thank you for your attention to this matter.

Sincerely yours,

**SUSAN
WEBSTER**

Digitally signed by SUSAN WEBSTER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=SUSAN WEBSTER,
0.9.2342.19200300.100.1.1=6800100365400
Date: 2021.01.22 15:27:43 -06'00'

Susan D. Webster, Chief
Assessment & Enforcement Branch (SEDA)
Superfund Division

Enclosures (4)

ENCLOSURE 1

FANSTEEL METALS/FMRI SUPERFUND SITE INFORMATION REQUEST

RESPONSE TO INFORMATION REQUEST

Under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as the federal "Superfund" law, the U.S. Environmental Protection Agency (EPA) responds to the release or threat of release of hazardous substances, pollutants or contaminants into the environment to stop additional contamination and to clean-up or otherwise address any prior contamination.

The EPA is requesting information under CERCLA Section 104(e). Section 104(e) may be found in the United States Code (U.S.C.) at Title 42 Section (section is denoted by the symbol "§") 9604(e), 42 U.S.C. § 9604(e).

Pursuant to the authority of CERCLA §104(e), you are hereby requested to respond to the enclosed information request. If you have any questions concerning the Fansteel Metals Site or this information request, please contact Mr. Lance Nixon, the designated Enforcement Officer for the Site, at (214) 665-2203 or via email at nixon.lance@epa.gov. Please provide your response within 30 calendar days of your receipt of this request. Due to the COVID-19 pandemic, access to mail may be limited. Please submit your response electronically via email to nixon.lance@epa.gov. If your response is too large to submit via email, please contact us and we will discuss additional options.

If you or your attorney have legal questions that pertain to this information letter request, please contact Mrs. Elizabeth Pletan at (214) 665-8525 or via email at pletan.elizabeth@epa.gov.

BACKGROUND INFORMATION

The Fansteel Site is a former metals processing plant that extracted tantalum and columbium (aka niobium) from ores and slag. The ore and slag contained trace amounts of uranium and thorium, enough to be considered as "source material" by the Nuclear Regulatory Commission (NRC). Fansteel, Inc. (Fansteel) operated under an NRC license that was modified when the facility stopped production (NRC License No. SMB-911). Fansteel filed for Chapter 11 bankruptcy protection in 2002. Under the bankruptcy settlement, Fansteel created a subsidiary, FMRI, as a vehicle to fulfill Fansteel's decommissioning obligations under the NRC license. FMRI has been maintaining the Site and operating groundwater and surface water collection and treatment units, the effluent of which is subject to State of Oklahoma permits. Fansteel again filed for bankruptcy in 2016 and that proceeding is ongoing.

In July 2018, the EPA conducted a removal action at the Site. The removal action included the disposal of miscellaneous laboratory contents and a 10,000-gallon aboveground storage tank (AST) containing Ammonium Hydroxide. A total of 1518 containers were removed from the laboratory area and transported to disposal and recycle facilities. A total of 1100 gallons of Ammonium Hydroxide was recovered from the 10,000-gallon AST. The recovered liquid was sent to a recycler for disposal/recycling. Air monitoring was conducted for the presence of carbon monoxide and radionuclides.

ENCLOSURE 2

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

INSTRUCTIONS and DEFINITIONS

1. Please provide a separate narrative response for each and every Question and subpart of a Question set forth in this Information Request.
2. Precede each answer with the Question (or subpart) and the number of the Question (and the letter of a subpart of a Question, if applicable) to which it corresponds.
3. If information or documents not known or not available to you as of the date of submission of a response to this Information Request should later become known or available to you, ***you must supplement*** your response to the U.S. Environmental Protection Agency (EPA). Moreover, should you find, at any time, after submission of your response, that any portion of the submitted information is false or misrepresents the truth, or, though correct when made, is no longer true, you must notify the EPA of this fact as soon as possible and provide the EPA with a corrected response.
4. For each document produced in response to this Information Request, indicate on the document, or in some other reasonable manner, the number of the Question (and the letter of a subpart of a Question, if applicable) to which it responds.
5. You may assert a business confidentiality claim covering part or all of the information which you submit in response to this request. Any such claim must be made by placing on (or attaching to) the information, at the time it is submitted to the EPA, a cover sheet or a stamped or typed legend or other suitable form of notice employing language such as "trade secret," "proprietary," or "company confidential." Confidential portions of otherwise non-confidential documents should be clearly identified and may be submitted separately to facilitate identification and handling by the EPA. If you make such a claim, the information covered by that claim will be disclosed by the EPA only to the extent, and by means of the procedures, set forth in subpart B of 40 CFR Part 2. If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. The requirements of 40 CFR Part 2 regarding business confidentiality claims were published in the Federal Register on September 1, 1976, and were amended September 8, 1976, and December 18, 1985.
6. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
7. Objections to questions. If you have objections to some or all the questions within the Information Request Letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words as they appear in this enclosure:

1. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
2. The term "any", as in "any documents" for example, shall mean "any and all."
3. The term "arrangement" means every separate contract or other agreement between two or more persons.
4. The terms "document(s)" and "documentation" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including meetings, agreements and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, telecopy, telefax, report, notice, message, analysis, comparison, graph, chart, map, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with the printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which is produced, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document and (e) every document referred to in any other document. The term "document" shall also mean any electronically stored information, including but not limited to emails, word processing files, spreadsheets, presentations, databases, geographic information system ("GIS") maps, computer-aided design files, scanned or digital photos, and scanned document images.
5. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business and personal addresses, email address(es), and telephone numbers, and present or last known job title, position or business.
6. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including, but not limited to, a sole proprietorship), to set forth its full name, address, and legal form (e.g. corporation including state of incorporation, partnership, etc.), organization, if any, a brief description of its business, and to indicate whether or not it is still in existence and, if it is no longer in existence, to explain how its existence was terminated and to indicate the date on which it ceased to exist. Also provide e-mail addresses for registered agents or other points of contact for the business entity.

7. The term "identify" means, with respect to a document, to provide the type of document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), subject matter, the identity of the author, addressor, addressee and/or recipient, and the present location of such document.
8. The term "person" shall have the same definition as in Subsection 101 (21) of CERCLA, 42 U.S.C. § 9601 (21).
9. The term "Site" or "facility" shall mean and include the Fansteel Metals Site in Muskogee, Oklahoma.
10. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors and agents.
11. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.
12. The term "Disposal" shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.
13. The term "Documents" includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent's possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.
14. The term "Environment" shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.
15. The term "Facility" shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

16. The term "Hazardous Substance" or "Hazardous Substances" shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.
17. The term "RCRA" shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).
18. The term "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
19. The term "Respondent" shall mean [name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent's plants or facilities. [Additional language for small business: The term "you" also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business]].
20. The term "Treatment" and "Treat" shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.
21. The term "TSCA" shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.
22. The term "Waste" or "Wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
23. The term "Waste Carriers" shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.
24. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 CFR Part 300 or 40 CFR Parts 260-280, in which case the statutory or regulatory definitions shall apply.

ENCLOSURE 3

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

QUESTIONS

1. Please provide the full legal name, mailing address, and phone number of the Respondent.
2. For each person answering these questions on behalf of the Respondent provide full name, title, business address, and business telephone and fax number.
3. If the Respondent wishes to designate an individual for all future correspondence concerning this Site, including legal notices, please provide the individual's name, address, telephone number, email address and fax number.
4. Please explain the business relationship between Respondent and Fansteel Metals.
5. Identify all transactions with the Site owners and/or operators that resulted in materials being sent to the Site by the respondent. for any purpose. Identify and provide all documents related to each transaction, including but not limited to, tolling agreements, invoices, manifests, shipping papers, bills of lading, receipts, log book entries, trip tickets, work orders, contracts, documents showing the nature of the materials involved, and any EPA and/or State environmental filings or correspondence. For each transaction, identify and state:
 - a. The type and purpose of the transaction;
 - b. A description of the materials involved, including their quantity and chemical content and characteristics;
 - c. A description of the steps taken by Respondent to determine whether the materials contained hazardous substances at the time of the transaction, and explain what precautions Respondent took to ensure that any hazardous substances were transported or disposed of properly;
 - d. Any amounts paid by or to Respondent in connection with each transaction;
 - e. The date of each transaction;
 - f. The date the materials were transported to the Site and/or when any materials or product were received by Respondent from the Site;
 - g. The name(s) and address(es) of any entities providing transportation services for such materials;
 - h. The name(s) and address(es) of any plants or facilities from which Respondent sent material to the Site, including a brief description of the nature of Respondent's operations at such plant or facility; and
 - i. if ownership of material changed at any point as a result of the transaction.

6. Please respond to the following questions regarding operations at the Site that were observed by Respondent during your business relationship with the Site and identify and provide any documents that relate to the following:
- a. What activities were typically conducted at the Site? What were the common business practices at the Site? How and when did Respondent obtain this information?
 - b. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? Provide the details of each visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
 - c. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
 - d. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
 - e. Did Respondent know if the owner(s)/operator(s) of the Site were removing a hazardous substance from the transferred material?
 - f. Did Respondent know, based on general industry knowledge, if hazardous substances would need to be removed from the transferred material in order for the material to be useful?
 - g. At the time Respondent transferred materials to the Site, were there any discussions and/or planning regarding the hazardous substances in the transferred materials? If yes, please detail those discussions and/or plans. What did Respondent intend to happen to any hazardous substances in those materials? Provide any agreements and documents, including waste logs, journals or notes reflecting the intentions of the parties. If Respondent does not have such documents or materials, please so state.
 - h. Specify any measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide any information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owner(s)/operator(s) of the Site regarding handling and ultimate disposition of hazardous substances that came to be at the Site as a result of Respondent sending material to the Site?

If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available.

ENCLOSURE 4

FANSTEEL METALS/FRMI SUPERFUND SITE INFORMATION REQUEST

PARTIES RECEIVING THIS LETTER

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane, Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration (GSA):

Kris Durmer
General Counsel
Office of General Counsel
1800 F Street N.W., Floor 2
Washington, D.C. 20405

Catherine Crow (Catherine.crow@gsa.gov)
Attorney

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

From: [Nixon, Lance](#)
To: karen.kalita@cabotcorp.com
Cc: [Pletan, Elizabeth](#)
Subject: Fansteel Metals 104(e) Information Request
Date: Monday, February 01, 2021 2:22:49 PM
Attachments: [Fansteel Cabot Corporation 104e for email.pdf](#)

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 2/22/2021 8:24:03 PM
To: Chintan Amin [chintan.amin@bayer.com]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: RE: Fansteel Site - HC Starck 104(e) Request

Hi Chintan,

Thank you for checking in! You're right, we are still working on this question, and we appreciate you being cognizant of possible deadlines. I'll let you know as soon as possible what we find out and we'll keep in mind you may need an extension.

Thank you again,
Elizabeth

From: Chintan Amin <chintan.amin@bayer.com>
Sent: Monday, February 22, 2021 9:59 AM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Fansteel Site - HC Starck 104(e) Request

Hello Elizabeth,

I hope you were able to stay safe and warm last week and have your utilities back.

I am sure your review has been affected by the weather, so I am only writing to ensure that we do not miss any deadlines. As we discussed on the phone, HC Starck was an independent subsidiary of Bayer Corporation that was sold over a decade ago. If EPA determines it is directing the 104(e) request to Bayer Corporation, I may need to pull boxes from long term storage to review. In such a case, Bayer would be seeking an extension of the deadline in your original 104(e) request.

Best regards,

Chintan Amin

Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

-----Original Appointment-----

From: Chintan Amin

Sent: Tuesday, February 9, 2021 4:24 PM
To: Chintan Amin; 'Pletan, Elizabeth'
Cc: Nixon, Lance; Clarke, Angienell
Subject: Superfund Enforcement Assessment Section SEDAE US EPA
When: Friday, February 12, 2021 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Thanks for getting back to me. Hopefully this time on Friday still works. I think my questions are primarily legal in nature, but it may be helpful to have one of the project managers on because it may help me understand how the entities addressed in the letter were named.

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Join with a video conferencing device

teams@pex-a.video.bayer.biz

Video Conference ID: 123 910 307 7

[Alternate VTC dialing instructions](#)

Or call in (audio only)

[+1 213-458-8486,536909948#](tel:+12134588486536909948#) United States, Los Angeles

Phone Conference ID: 536 909 948#

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | [Meeting options](#)

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Sent: Tuesday, February 9, 2021 3:50 PM

To: Chintan Amin <chintan.amin@bayer.com>

Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Mr. Amin,

My apologies for missing your call earlier! I would be happy to set up a call to discuss the information request. I have cc'ed our Enforcement Officers Lance Nixon and Angienell Clark—it may be helpful to have them on the call. So far we have availability this Friday February 12 anytime except for 1:00 PM to 2:00 PM, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12:00 PM Central. My Thursday and Friday next week are currently blocked off but should open up in the next couple of days. Please let me know if any of those times will work for you and I will set up a Teams meeting.

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Chintan Amin <chintan.amin@bayer.com>
Sent: Tuesday, February 09, 2021 2:08 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Ms. Pletan,

I left a message regarding the attached Section 104(e) letter for your earlier today but with everybody being remote, I'm not sure if you've seen it. When you have a moment, would you let me know when you are available for a call to discuss? I would like to clarify the organization to whom it is addressed. Thank you.

Best regards,

Chintan Amin
Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

From: Christine Thomas <christine.thomas@bayer.com>
Sent: Tuesday, February 9, 2021 10:43 AM
To: Chintan Amin <chintan.amin@bayer.com>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Here you Chintan.

Thanks,
Christine

From: Nancy Hynson <nancy.hynson.ext@bayer.com>
Sent: Tuesday, February 9, 2021 10:41 AM

To: Christine Thomas <christine.thomas@bayer.com>

Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Hi Christine,

Here you go.

Nancy

The information contained in this e-mail is for the exclusive use of the intended recipient(s) and may be confidential, proprietary, and/or legally privileged. Inadvertent disclosure of this message does not constitute a waiver of any privilege. If you receive this message in error, please do not directly or indirectly use, print, copy, forward, or disclose any part of this message. Please also delete this e-mail and all copies and notify the sender. Thank you.

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Message

From: Chintan Amin [chintan.amin@bayer.com]
Sent: 2/22/2021 3:59:15 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: Fansteel Site - HC Starck 104(e) Request

Hello Elizabeth,

I hope you were able to stay safe and warm last week and have your utilities back.

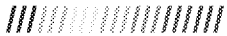
I am sure your review has been affected by the weather, so I am only writing to ensure that we do not miss any deadlines. As we discussed on the phone, HC Starck was an independent subsidiary of Bayer Corporation that was sold over a decade ago. If EPA determines it is directing the 104(e) request to Bayer Corporation, I may need to pull boxes from long term storage to review. In such a case, Bayer would be seeking an extension of the deadline in your original 104(e) request.

Best regards,

Chintan Amin

Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

-----Original Appointment-----

From: Chintan Amin
Sent: Tuesday, February 9, 2021 4:24 PM
To: Chintan Amin; 'Pletan, Elizabeth'
Cc: Nixon, Lance; Clarke, Angienell
Subject: Superfund Enforcement Assessment Section SEDAE US EPA
When: Friday, February 12, 2021 10:00 AM-10:30 AM (UTC-05:00) Eastern Time (US & Canada).
Where: Microsoft Teams Meeting

Thanks for getting back to me. Hopefully this time on Friday still works. I think my questions are primarily legal in nature, but it may be helpful to have one of the project managers on because it may help me understand how the entities addressed in the letter were named.

Microsoft Teams meeting

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Or call in (audio only)

+1 213-458-8486,,536909948# United States, Los Angeles

Phone Conference ID: 536 909 948#

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | [Meeting options](#)

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Sent: Tuesday, February 9, 2021 3:50 PM

To: Chintan Amin <chintan.amin@bayer.com>

Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Mr. Amin,

My apologies for missing your call earlier! I would be happy to set up a call to discuss the information request. I have cc'ed our Enforcement Officers Lance Nixon and Angienell Clark—it may be helpful to have them on the call. So far we have availability this Friday February 12 anytime except for 1:00 PM to 2:00 PM, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12:00 PM Central. My Thursday and Friday next week are currently blocked off but should open up in the next couple of days. Please let me know if any of those times will work for you and I will set up a Teams meeting.

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Chintan Amin <chintan.amin@bayer.com>

Sent: Tuesday, February 09, 2021 2:08 PM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Ms. Pletan,

I left a message regarding the attached Section 104(e) letter for your earlier today but with everybody being remote, I'm not sure if you've seen it. When you have a moment, would you let me know when you are available for a call to discuss? I would like to clarify the organization to whom it is addressed. Thank you.

Best regards,

Chintan Amin

Sr Asst General Counsel

Head of Real Estate and HSE Law – Health Care and Platform

(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



Bayer U.S. LLC
100 Bayer Blvd
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United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

From: Christine Thomas <christine.thomas@bayer.com>

Sent: Tuesday, February 9, 2021 10:43 AM

To: Chintan Amin <chintan.amin@bayer.com>

Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Here you Chintan.

Thanks,
Christine

From: Nancy Hynson <nancy.hynson.ext@bayer.com>

Sent: Tuesday, February 9, 2021 10:41 AM

To: Christine Thomas <christine.thomas@bayer.com>

Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Hi Christine,

Here you go.

Nancy

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Message

From: Clarke, Angienell [Clarke.Angienell@epa.gov]
Sent: 2/19/2021 8:31:49 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility

Can I use the extension approval letter that you recently used for Cabot?

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, February 19, 2021 2:20 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Hi Elizabeth,

Susan has approved the extension, however a partial response should be submitted by the 30 day mark (April 13) with the final response due at the end of the 60 day extension (May 13). I'll draft up a letter for Susan's signature with the new due dates.

Angie,

Would you like to draft up the extension approval letter?

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 3:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: FW: 104(e) Fansteel Metals Facility

Hi Lance and Angienell, I heard from Dow, and they are asking for an extension as well as nexus information.

Thank you!

Elizabeth

From: Pletan, Elizabeth
Sent: Thursday, February 18, 2021 3:07 PM
To: 'Reed, Weslynn (WP)' <WPRreed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,

Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Reed, Weslynn (WP) <WPReed@dow.com>

Sent: Thursday, February 18, 2021 2:12 PM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed

Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company

2211 H.H. Dow Way, Midland, MI 48674

Office: 989.496.1167

Cell: 989.423.5564

Email: wpreed@dow.com



Message

From: Clarke, Angienell [Clarke.Angienell@epa.gov]
Sent: 2/19/2021 8:21:53 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility

Sure. I can draft the extension approval letter.

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, February 19, 2021 2:20 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility

Hi Elizabeth,
Susan has approved the extension, however a partial response should be submitted by the 30 day mark (April 13) with the final response due at the end of the 60 day extension (May 13). I'll draft up a letter for Susan's signature with the new due dates.

Angie,
Would you like to draft up the extension approval letter?

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 3:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: FW: 104(e) Fansteel Metals Facility

Hi Lance and Angienell, I heard from Dow, and they are asking for an extension as well as nexus information.

Thank you!
Elizabeth

From: Pletan, Elizabeth
Sent: Thursday, February 18, 2021 3:07 PM
To: 'Reed, Weslynn (WP)' <WPReed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



Message

From: Webster, Susan [webster.susan@epa.gov]
Sent: 2/19/2021 6:27:55 PM
To: Johnson, Lydia [johnson.lydia@epa.gov]; Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility- Extension Request

Thank you both. susan

Susan D. Webster, Chief

Assessment and Enforcement Branch (SEDA)

U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue
Dallas, Texas 75202
Office: 214.665.6784
Cell: 214.789.2667
webster.susan@epa.gov

From: Johnson, Lydia <johnson.lydia@epa.gov>
Sent: Friday, February 19, 2021 11:35 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Webster, Susan <webster.susan@epa.gov>
Subject: RE: 104(e) Fansteel Metals Facility- Extension Request

Hi Lance,

I just discussed the extension with Susan and she's ok with 60 day extension but Dow needs to provide a partial response in 30 days and complete their response in 60 days.

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, February 19, 2021 10:19 AM
To: Webster, Susan <webster.susan@epa.gov>
Cc: Johnson, Lydia <johnson.lydia@epa.gov>
Subject: FW: 104(e) Fansteel Metals Facility- Extension Request

Hi Susan,

Dow Chemical (Union Carbide) has request a 60 day extension to respond to the 104(e) for Fansteel. Their request is in the email chain below.

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 3:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: FW: 104(e) Fansteel Metals Facility

Hi Lance and Angienell, I heard from Dow, and they are asking for an extension as well as nexus information.

Thank you!
Elizabeth

From: Pletan, Elizabeth
Sent: Thursday, February 18, 2021 3:07 PM

To: 'Reed, Weslynn (WP)' <WPreed@dow.com>

Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

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From: Reed, Weslynn (WP) <WPreed@dow.com>

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To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed

Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



Message

From: Webster, Susan [webster.susan@epa.gov]
Sent: 2/19/2021 4:33:51 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: Re: 104(e) Fansteel Metals Facility- Extension Request

Let's discuss at 11 am. To

Sent from my iPhone

On Feb 19, 2021, at 10:19 AM, Nixon, Lance <Nixon.Lance@epa.gov> wrote:

Hi Susan,
Dow Chemical (Union Carbide) has request a 60 day extension to respond to the 104(e) for Fansteel.
Their request is in the email chain below.

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 3:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: FW: 104(e) Fansteel Metals Facility

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From: Pletan, Elizabeth
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To: 'Reed, Weslynn (WP)' <WPReed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

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From: Reed, Weslynn (WP) <WPreed@dow.com>

Sent: Thursday, February 18, 2021 2:12 PM

To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed

Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company

2211 H.H. Dow Way, Midland, MI 48674

Office: 989.496.1167

Cell: 989.423.5564

Email: wpreed@dow.com



Message

From: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Sent: 2/18/2021 9:07:55 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]
Subject: FW: 104(e) Fansteel Metals Facility

Hi Lance and Angienell, I heard from Dow, and they are asking for an extension as well as nexus information.

Thank you!
Elizabeth

From: Pletan, Elizabeth
Sent: Thursday, February 18, 2021 3:07 PM
To: 'Reed, Weslynn (WP)' <WPReed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Reed, Weslynn (WP) <WPReed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,
I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed

Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company

2211 H.H. Dow Way, Midland, MI 48674

Office: 989.496.1167

Cell: 989.423.5564

Email: wpreed@dow.com



Message

From: Gerry Caron [gerry.caron@cabotcorp.com]
Sent: 2/3/2021 4:35:11 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Thanks Lance. I will review and confirm back with any questions. Gerry

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Gerry Caron <gerry.caron@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: [EXTERNAL] RE: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Gerry,
Thank you for your response. Yes, I agree that email would be the best way to correspond. I do check my voicemail frequently, but email is best.

I've attached a document that we have in our files indicating a nexus between Cabot Corp. and the Fansteel Metals site. I hope you find the document helpful.

Please let me know if you need anything else or have additional questions.

Thanks

-Lance Nixon

From: Gerry Caron <gerry.caron@cabotcorp.com>
Sent: Tuesday, February 2, 2021 3:15 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: FW: Fansteel Metals 104(e) Information Request/Cabot Corp.

Hi Lance. I left you a voicemail a few minutes ago introducing myself on behalf of Cabot Corp. I realize with Covid and so many folks working remotely that email may be a better choice than voicemail!

Could you please email to me any documents that EPA has in its file indicating a nexus between Cabot Corp. and the Fansteel Metals site? This will help us conduct an internal review and inquiry regarding the site and any potential connections with Cabot Corp.

Please let me know if you have any questions. Also, if you would like to call me, my cell number is 617-515-4529.

Thanks,

Gerry Caron

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Monday, February 1, 2021 3:23 PM
To: Karen Kalita <Karen.Kalita@cabotcorp.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: [EXTERNAL] Fansteel Metals 104(e) Information Request

Dear Sir/Madam:

EPA is seeking information regarding the Fansteel Metals Facility in Muskogee, Oklahoma pursuant to its information gathering authority under CERCLA Section 104(e), 42 U.S.C. 9604(e). Please see attached a letter and Information Request. We are transmitting this letter and information request via email for your convenience. Please respond to this information request within 30 days of your receipt of this email message. If you have any questions, please contact me at (214) 665-2203 or nixon.lance@epa.gov. For any legal questions, please have your counsel contact Elizabeth Pletan at (214) 665-8525 or Pletan.elizabeth@epa.gov.

Thank You.

Lance Nixon

Enforcement Officer
U.S. Environmental Protection Agency
Superfund and Emergency Management Division
Assessment and Enforcement Branch
214-665-2203

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**Fansteel Metals Superfund Site
Address List**

Amalgamet, Inc.
(FKA Amalgamet-Finamines)
Hamish Michie, CEO
222 Bloomingdale Road
Suite 101
White Plains, New York 10605

Shell Offshore Inc.
(FKA Billiton Trading Co. - Thailand Smelting)
Richard H. Tallant, CEO
150 N. Dairy Ashford Road, Suite 101
Houston, Texas 77079

The Corporation Trust Company
For Shell Offshore Inc.
1209 Orange Street
Wilmington, Delaware 19801

Cabot Corporation
Sean D. Keohane
President and CEO
Two Seaport Lane
Suite 1300
Boston, Massachusetts 02210

Corporation Service Company
For Cabot Corporation
251 Little Falls Drive
Wilmington, Delaware 19808

General Services Administration

Metallurg, Inc.
(FKA GFE Conversion)
Heinz Schimmelbusch, CEO
435 Devon Park Drive
Building 200
Wayne, Pennsylvania 19087

The Corporation Trust Company
For Metallurg, Inc.
1209 Orange Street
Wilmington, Delaware 19801

Osram Sylvania Inc.
(FKA GTE – Sylvania)
Michael Flieger, CEO
200 Ballardvale Street
Wilmington, Massachusetts 01887

Corporate Creations Network Inc.
For Osram Sylvania Inc.
3411 Silverside Road
Tatnall Bldg., Suite 104
Wilmington, Delaware 19810

Bayer Corporation
(FKA Hermann C. Stark, Inc.)
Philip Blake
President and CEO
100 Bayer Boulevard
Whippany, New Jersey 07981

Corporation Service Company
135 N. Pennsylvania Street, Suite 1610
Indianapolis, Indiana 46204

Kennametal, Inc.
Christopher Rossi
President and CEO
525 William Penn Place
Suite 330
Pittsburgh, Pennsylvania 15219

Philips Holding USA Inc.
for Philips North America LLC
(FKA Mepco Electra)
Vitor Rocha, CEO
222 Jacobs Street
3rd Floor
Cambridge, Massachusetts 02141

Corporation Service Company
For Philips Holding USA Inc.
251 Little Falls Drive
Wilmington, Delaware 19808

Everzinc USA Inc.
(FKA Sogem Corporation-Norore Division)
Vincent Dujardin, CEO
3717 National Drive
Suite 105
Raleigh, North Carolina 27612

Corporation Service Company
For Everzinc USA Inc.
80 State Street
Albany, New York 12207

Union Carbide Corporation
Richard A. Wells, CEO
7501 State Highway 185 North
North Seadrift, Texas 77983

CT Corporation System
For Union Carbide Corporation
28 Liberty Street
New York, New York 10005

Valenite, LLC
(FKAValeron Metals)
Richard Askin, Manager
1702 Nevins Road
Fair Lawn, New Jersey 07410

Corporation Service Company
For Valenite, LLC
251 Little Falls Drive
Wilmington, Delaware 19808

Message

From: Aselda.Thompson@shell.com [Aselda.Thompson@shell.com]
Sent: 2/17/2021 8:20:14 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: RE: Fansteel 104(e) information request

Flag: Follow up


Thanks for the response Liz – these are crazy times for Texas! It would be helpful to have an extension of time, and I'd also like to ask if you're able to provide any information or documents that demonstrate the nexus or connection of Shell to the site – this will definitely help us to search our records more efficiently.

Glad you hear you're all doing ok! We're in the same boat – glad to have power and water, at least for now.

Take care and we can talk when things calm down.

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 17, 2021 12:07 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Subject: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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Message

From: Pletan, Elizabeth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C65F2ACDE2D64342B1803EEE05D9BBB3-PLETAN, ELIZABETH]
Sent: 2/17/2021 6:06:47 PM
To: Aselda.Thompson@shell.com
Subject: Fansteel 104(e) information request

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
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United States Environmental Protection Agency, Region 6
(214) 665-8525

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Message

From: Aselda.Thompson@shell.com [Aselda.Thompson@shell.com]
Sent: 3/1/2021 5:47:36 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: RE: Fansteel 104(e) information request

Hi Liz,

Hope you had a great weekend!

I'm working with my client groups to track down any information we may have to any of these entities and I'm hoping you might be able to provide what EPA believes to be the nexus or connection to Shell? That will help us direct our search.

Many thanks!

Aselda

From: Thompson, Aselda J SHLOIL-LSPT/EE
Sent: Wednesday, February 17, 2021 2:20 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: RE: Fansteel 104(e) information request


Thanks for the response Liz – these are crazy times for Texas! It would be helpful to have an extension of time, and I'd also like to ask if you're able to provide any information or documents that demonstrate the nexus or connection of Shell to the site – this will definitely help us to search our records more efficiently.

Glad you hear you're all doing ok! We're in the same boat – glad to have power and water, at least for now.

Take care and we can talk when things calm down.

Aselda

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Wednesday, February 17, 2021 12:07 PM
To: Thompson, Aselda J SHLOIL-LSPT/EE <Aselda.Thompson@shell.com>
Subject: Fansteel 104(e) information request

 **Think Secure. This email is from an external source.**

Hello Aselda, apologies for not having gotten back to you yet! I hope you and your family are still doing well. I'm very grateful to still have power and everything at my house, but the weather is causing all sorts of issues and it may be next week before I'm able to chat. You are probably very familiar with the 104(e) process, but we are usually very liberal when granting extensions of time to respond if that ends up being necessary due to these circumstances!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6

(214) 665-8525

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Message

From: Reed, Weslynn (WP) [WPreed@dow.com]
Sent: 2/19/2021 3:18:10 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: RE: 104(e) Fansteel Metals Facility

Flag: Follow up

Thank you, Elizabeth. There is no rush on our end. Stay safe and warm!

Wes

Weslynn Reed

Counsel — U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com

From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Sent: Thursday, February 18, 2021 4:07 PM
To: Reed, Weslynn (WP) <WPreed@dow.com>
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Reed, Weslynn (WP) <WPreed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed

Counsel -- U.S. Operations, Regulatory and North America

The Dow Chemical Company

2211 H.H. Dow Way, Midland, MI 48674

Office: 989.496.1167

Cell: 989.423.5564

Email: wpreed@dow.com



Message

From: Pletan, Elizabeth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C65F2ACDE2D64342B1803EEE05D9BBB3-PLETAN, ELIZABETH]
Sent: 2/18/2021 9:06:52 PM
To: Reed, Weslynn (WP) [WPreed@dow.com]
Subject: RE: 104(e) Fansteel Metals Facility

Hello Ms. Reed,

My apologies for missing your call earlier! We usually have no problem granting extensions but I'll need to confirm with my clients so we can get you the extension in writing. We will also provide you with nexus information. Unfortunately the severe weather here in Dallas has impacted our operations so it may take us a few days to provide you with that information. We appreciate you contacting us and your patience!

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United States Environmental Protection Agency, Region 6
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From: Reed, Weslynn (WP) <WPreed@dow.com>
Sent: Thursday, February 18, 2021 2:12 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: 104(e) Fansteel Metals Facility

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed
Counsel – U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



Message

From: Reed, Weslynn (WP) [WPreed@dow.com]
Sent: 2/18/2021 8:11:55 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: 104(e) Fansteel Metals Facility
Attachments: Environmental Protection Agency 2-12-21.pdf

Flag: Follow up

Hello Ms. Pletan,

I'm writing to follow up on a voicemail I left you today regarding the 104(e) Request for Information received by Union Carbide Corporation on February 12 regarding the Fansteel Metals Facility in Muskogee, Oklahoma. Would EPA be amenable to a 60 day deadline extension for Union Carbide's Response? The company needs additional time to search for and review any archived records, which is especially difficult to coordinate during the pandemic.

Also, if you have them, would you please provide any nexus documents for Union Carbide at the site?
Thank you,

Weslynn Reed

Counsel --- U.S. Operations, Regulatory and North America

The Dow Chemical Company
2211 H.H. Dow Way, Midland, MI 48674
Office: 989.496.1167
Cell: 989.423.5564
Email: wpreed@dow.com



Message

From: Pletan, Elizabeth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C65F2ACDE2D64342B1803EEE05D9BBB3-PLETAN, ELIZABETH]
Sent: 3/22/2021 9:46:07 PM
To: Edelstein, David M. [dmedelstein@vorys.com]
Subject: FW: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401
Attachments: Metallurg, Inc. - Scan 4.pdf

Hello David, please see attached.

-Elizabeth

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Tuesday, March 16, 2021 4:12 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

John,
Please see the attached documents for your review. Please let us know if you need anything else or would like to see more documents. Thank you for your cooperation.
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 3:46 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: Re: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Thanks for the update.

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Friday, March 12, 2021 4:44:53 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Hello John,
I apologize about the delay. There was a mix-up on my part. I have the nexus documents ready, however, I have to wait until I get approval to release them to you. Once I get the approval I will send them to you immediately. Again, I'm sorry about the delay.

Thanks
-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Friday, March 12, 2021 7:39 AM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Lance,

Have you had an opportunity to access the Nexus documents?

Thanks
John

From: Nixon, Lance <Nixon.Lance@epa.gov>
Sent: Wednesday, March 3, 2021 4:27 PM
To: John Hunt <jhunt@amg-nv.com>
Cc: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>
Subject: RE: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

We look forward to hearing from you April 9, 2021. I will try to get some nexus documents to you sometime next week. Your cooperation is greatly appreciated.

-Lance

From: John Hunt <jhunt@amg-nv.com>
Sent: Wednesday, March 3, 2021 1:08 PM
To: Nixon, Lance <Nixon.Lance@epa.gov>
Subject: CERCLA 104(e) Information Request- Fansteel Metals Facility, 10 Tantalum Place, Muskogee, Oklahoma 74401

Mr. Nixon,

I received your CERCLA 104(e) Information Requests dated January 22, 2021 that were sent to the attention of Dr. Heinz Schimmelbusch at Metallurg, Inc located at 435 Devon Park Dr, Building 200, Wayne, PA 19087. Unfortunately our office has been closed with limited access due to COVID-19 restriction. Please find attached a letter documenting that we are in receipt of the CERCLA 104(e) Information Requests and that we are preparing to respond by April 9, 2021.

I apologize for the delay in our response. If you have any questions or comments you can reach me via email or on my mobile # (617) 957-5961.

Regards,
John

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Message

From: Aselda.Thompson@shell.com [Aselda.Thompson@shell.com]
Sent: 2/17/2021 6:06:52 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: Automatic reply: Fansteel 104(e) information request

Thanks for your message. Due to weather-related issue sin Houston, I will be unable to regularly access messages. I will be checking emails when I can, but please expect a delay in my response.

Message

From: Chintan Amin [chintan.amin@bayer.com]
Sent: 3/5/2021 7:27:24 PM
To: Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
Subject: Automatic reply: Fansteel Site - HC Starck 104(e) Request

Sorry I missed your message.

I am out of the office on holiday on Friday, March 5. I will be back in the office on Monday, March 8.

If you need immediate help, please call Kathy Logut, my assistant, at 412-777-2881.

Chintan

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Appointment

From: Chintan Amin [chintan.amin@bayer.com]
Sent: 2/9/2021 9:26:34 PM
To: Chintan Amin [chintan.amin@bayer.com]; Pletan, Elizabeth [Pletan.Elizabeth@epa.gov]
CC: Nixon, Lance [Nixon.Lance@epa.gov]; Clarke, Angienell [Clarke.Angienell@epa.gov]

Subject: Superfund Enforcement Assessment Section SEDAE US EPA
Location: Microsoft Teams Meeting

Start: 2/12/2021 3:00:00 PM
End: 2/12/2021 3:30:00 PM
Show Time As: Busy

Recurrence: (none)

Thanks for getting back to me. Hopefully this time on Friday still works. I think my questions are primarily legal in nature, but it may be helpful to have one of the project managers on because it may help me understand how the entities addressed in the letter were named.

Microsoft Teams meeting

Join on your computer or mobile app

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teams@pex-a.video.bayer.biz

Video Conference ID: 123 910 307 7

[Alternate VTC dialing instructions](#)

Or call in (audio only)

[+1 213-458-8486,536909948#](tel:+12134588486536909948#) United States, Los Angeles

Phone Conference ID: 536 909 948#

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From: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>

Sent: Tuesday, February 9, 2021 3:50 PM

To: Chintan Amin <chintan.amin@bayer.com>

Cc: Nixon, Lance <Nixon.Lance@epa.gov>; Clarke, Angienell <Clarke.Angienell@epa.gov>

Subject: RE: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Mr. Amin,

My apologies for missing your call earlier! I would be happy to set up a call to discuss the information request. I have cc'ed our Enforcement Officers Lance Nixon and Anginell Clark—it may be helpful to have them on the call. So far we have availability this Friday February 12 anytime except for 1:00 PM to 2:00 PM, Tuesday February 16 after 2:00 PM Central and Wednesday February 17 after 12:00 PM Central. My Thursday and Friday next week are currently blocked off but should open up in the next couple of days. Please let me know if any of those times will work for you and I will set up a Teams meeting.

Sincerely,
Elizabeth

Elizabeth Pletan, Attorney
Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency, Region 6
(214) 665-8525

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From: Chintan Amin <chintan.amin@bayer.com>
Sent: Tuesday, February 09, 2021 2:08 PM
To: Pletan, Elizabeth <Pletan.Elizabeth@epa.gov>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Dear Ms. Pletan,

I left a message regarding the attached Section 104(e) letter for your earlier today but with everybody being remote, I'm not sure if you've seen it. When you have a moment, would you let me know when you are available for a call to discuss? I would like to clarify the organization to whom it is addressed. Thank you.

Best regards,

Chintan Amin
Sr Asst General Counsel
Head of Real Estate and HSE Law – Health Care and Platform
(Admitted in Penn. and Ga., Admission in N.J. Pending)

I'm an ally



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100 Bayer Blvd
Whippany, New Jersey 07981
United States
Tel: +1 412 777-2715
Mobile: +1 412 539-5518
E-mail: chintan.amin@bayer.com
Web: <http://www.bayer.us>

From: Christine Thomas <christine.thomas@bayer.com>
Sent: Tuesday, February 9, 2021 10:43 AM

To: Chintan Amin <chintan.amin@bayer.com>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Here you Chintan.

Thanks,
Christine

From: Nancy Hynson <nancy.hynson.ext@bayer.com>
Sent: Tuesday, February 9, 2021 10:41 AM
To: Christine Thomas <christine.thomas@bayer.com>
Subject: FW: Superfund Enforcement Assessment Section SEDAE US EPA

Hi Christine,

Here you go.

Nancy

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Delivery Report

From: Pletan, Elizabeth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=C65F2ACDE2D64342B1803EEE05D9BBB3-PLETAN, ELIZABETH]
Sent: 2/1/2021 8:23:20 PM
To: Nixon, Lance [Nixon.Lance@epa.gov]
Subject: Read: Fansteel Metals 104(e) Information Request

Your message

To: karen.kalita@cabotcorp.com
CC: Pletan, Elizabeth
Subject: Fansteel Metals 104(e) Information Request
Sent: 2/1/2021 8:22:47 PM

was read on 2/1/2021 8:23:04 PM